

Stockholm & Brussels, 3 November, 2016

To: The Fisheries Ministers of the EU Member States

Re: [Input to the EU Fisheries Council Meeting, 14–15 November 2016](#)

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR), we send you our recommendations regarding the Commission proposal for a Council Regulation fixing for 2017 and 2018 the fishing opportunities for Union fishing vessels for certain deep-sea fish stocks (COM(2016)643). We urge you to take our recommendations into account during your discussions at the upcoming Council meeting.

Setting precautionary TACs in line with scientific advice and the objectives of the Common Fisheries Policy (CFP) will complement the recently agreed deep-sea access regime (COM(2012)371) – which still needs to be adopted by the co-legislators – in the protection of the deep sea. Achieving a high sustainable long-term yield in line with the MSY objective under the CFP, will be a particular challenge with deep-sea species, as they are generally slow-growing, late-maturing and have a low reproductive rate, which makes them particularly vulnerable to overfishing, especially when there is limited scientific knowledge.

Moreover, in deep-sea fisheries, and particularly bottom trawl fisheries, bycatch levels are high and catches contain a wide range of species, resulting in significant impacts on these non-target species and on the wider deep-sea environment.

In the proposal, many of the 49 deep-sea species listed in the proposal for a revised deep sea access regime (COM(2012)371) are missing, leaving them unmanaged and unregulated. In addition, the management of deep-sea stocks is still hampered by mismatches between management units and the areas assessed by the scientific bodies.

Given these considerations we urge you to at least follow scientific advice for deep-sea fishing possibilities, as this should be acknowledged as the bare minimum to achieve sustainable fisheries.

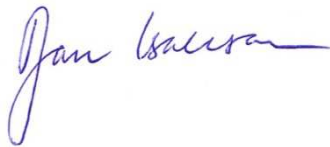
Regarding the fixing of fishing opportunities for individual species, we recommend:

- Alfonsinos: follow the Commission proposal of 280 tonnes for each year;
- Orange roughy: to follow the Commission proposal to prohibit orange roughy from being fished and transhipped. However, to prohibit its retainment on board or its landing would in practice allow for unlimited and uncontrolled by-catches and discards of a threatened species. Therefore we urge you that any catches of orange roughy must be landed and reported, but cannot be sold for any purpose;
- Red seabream: follow scientific advice and do not allow any targeted fishery in areas VI, VII and VIII; limit the TACs in areas IX and X to 138 tonnes and 400 tonnes for each year respectively;

- Greater forkbeard: follow scientific advice and agree on combined landings for all areas of no more than 1682 tonnes in each year;
- Black scabbardfish: follow scientific advice and set a combined TAC for all areas of no more than 5894 tonnes in 2017, and follow the Commission proposal for 2018 with 4870 tonnes; we also ask you to not allow bottom trawl fishing in subareas VI and VII and division Vb and XIIb to contribute to the conservation of roundnose grenadier;
- Roughhead grenadier: follow the scientific advice and do not allow any directed fishery;
- Roundnose grenadier: follow scientific advice and close all targeted fisheries in area III, agree on landings of no more than 65 tonnes for each 2017 and 2018 for area I, II, IV, VIII, IX, XIVa, XIVb2, Va2 and no more than 717 tonnes for each 2017 and 2018 for areas Xb, XIIc, XIIa2, XIVb1, Va1. For areas Vb, VI, VII, XIIb, we urge you to adopt a zero TAC.

See Annex 1 for more detailed comments on the deep-sea fishing opportunities for 2017–2018.

Yours sincerely,



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