

Stockholm & Brussels, February 15, 2011

Re: Input to the EU discussion on discards, 1 March 2011

Dear Minister,

The ongoing reform of the Common Fisheries Policy provides an important opportunity to tackle the problems with unselective fishing, bycatch, and consequently discarding. On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we would therefore like to offer you some timely thoughts on bycatch and discards in fisheries across the EU.

Discarding levels in European fisheries overall are higher than elsewhere. According to Commission figures, the situation is particularly serious in the North-east Atlantic area, where discards are estimated to be around 1,332,000 tonnes – making up 19.6 % of global discards for just 11 % of global landings. Available information on bycatch and discards clearly shows that trawl fisheries in particular cause this problem, with some fisheries discarding up to 90% of their catch.

The key issue is to avoid unwanted catches in the first place, for example by requiring use of the best available (most selective) gear and real-time closures. In addition to efforts to reduce bycatch, we support the Commission's proposal to move towards a discard ban, combined with a shift to catch quotas. Some exceptions may be allowed, based on adequate documentation of, for instance, high potential for survival when released. Overall, implementation needs to ensure that the discard ban effectively mitigates unnecessary biomass removal from the seas, and not just creates new markets for what used to be discarded. With effective enforcement, a discard ban could then be a major step towards more sustainable European fisheries.

Aside from a discard ban, use should be made of a combination of different tools and incentives, such as giving preferential access to fish resources to those fishing in the most sustainable way, to effectively promote more selective fishing gears.

Finally, any policy on bycatch, selectivity and discarding should be complementary to other necessary management measures such as capacity reduction. We do not believe that a system purely based on effort management can effectively address the problem of discards. An effort-based regime provides strong incentives to increase the catch per unit effort, whereas technical measures to reduce by-catch generally reduce the catch per unit effort. Management by effort also fails to protect the weakest stock in mixed fisheries.

See Annex 1 for the OCEAN2012 position paper on discards.

Yours sincerely,



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