

Stockholm & Brussels, June 14, 2011

To: The Fisheries Ministers of EU Member States

Re: Input to the EU Fisheries Council Meeting, 28 June 2011

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we send you our recommendations regarding the Communication from the Commission concerning a consultation on Fishing Opportunities (COM(2011)298). We ask you to support our recommendations in your deliberations at the Council meeting in order to ensure more sustainable utilisation of our common marine resources.

We welcome this Communication, in which the Commission sets out some basic principles for agreeing on Total Allowable Catches (TACs) for 2012. The Commission is also proposing a new, more precautionary approach to management when facing scientific uncertainty, whether it is due to a lack of knowledge concerning stock status or catch levels. Finally, the Commission has included a revised timetable for proposals and decisions on fishing possibilities.

We support the proposed simplification of fixing fishing opportunities, but would like to draw your attention to the following issues:

- Although we support the commitment that all stocks are exploited at **Maximum sustainable yield (MSY)** by 2015, we insist that MSY should not be considered the ultimate target, but only constitute an intermediate target for stocks that are overfished. More precautionary targets, such as Maximum Economic Yield (MEY) should already be considered for stocks that are close to or at MSY today.
- TACs set in excess of scientific advice dropped again from 2010 to 2011, but 23 percent are still too high. There is an urgent need to **align TACs with the scientific advice** for all stocks and to fulfil the international commitment to MSY by 2015.
- We strongly urge the Council to do its utmost to **resolve the disagreements surrounding LTMPs** in order to ensure good management of stocks. Multi-annual management plans with **inadequate targets and/or where objectives are not being met need to be revised** as soon as possible.
- We support the Commission's **precautionary** thinking on **management of 'data poor'** stocks, but further steps are needed. We **urge Member States to fulfil their obligations under the Community framework for the collection, management and use of data** in the fisheries sector; otherwise sanctions should be imposed. If needed, mechanisms to divert public funds for collecting and enhancing fisheries data should be introduced under the new financial instrument. To manage data deficiencies in a cost effective manner, scientific advice using a risk-assessment approach including data quality and vulnerability of the stock should be considered.

- Regarding the Commission consultation on effort management, we believe the setting of catch limits is a more precise and effective tool. When effort management is used, it needs to be carefully tailored to the specific fishery and the long-term effects on the sector need to be considered.
- We support the proposed changes to the timetable of work.

See Annex 1 for more detailed comments on the communication.

Yours sincerely,



Niki Sporrang
Director
Fisheries Secretariat (FISH)



Monica Verbeek
Executive Director
Seas At Risk (SAR)