

Stockholm & Brussels, 4 July, 2014

To: The Fisheries Ministers of the EU Member States

Re: Input to the EU Fisheries Council Meeting, 14 July 2014

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR), we send you our thoughts regarding the Communication from the Commission concerning a consultation on Fishing Opportunities for 2015 (COM(2014)388). We ask you to consider our views during your discussions at the upcoming Council meeting.

We welcome this communication, in which the European Commission sets out principles for the fixing of fishing opportunities for 2015. It shows a clear commitment to implement the reformed Common Fisheries Policy (CFP) and specifically its MSY objective.

In the communication, the Commission has listed a number of principles for fixing fishing possibilities for 2015, which will be applied in its proposals for fishing limits later this year. They are largely based on the level of information available for the stocks, and divided into two main categories: 1) stocks with full assessments and MSY estimates and 2) other stocks. In general, we support the proposed principles, but would like you to consider the following points:

- FMSY can be set by 2015 for all stocks under full assessment, as well as for stocks with MSY proxies, whereas it will take many stocks time to rebuild to biomass levels capable of producing MSY. Therefore, this autumn the Commission should propose and the Council agree on fishing limits for 2015 at or below FMSY, depending on whether the stock is in need of rebuilding.
- There is specific reference to the possibility to delay MSY implementation in 2015 if it could “seriously jeopardise the social and economic sustainability of the fishing fleets”. However, the Commission does not attempt to specify what would define “seriously jeopardise”. This is a great weakness that needs to be addressed. Any such delays must be clearly motivated and a plan for achieving FMSY by 2020 at the latest must be agreed.
- We support the proposal to manage all stocks under existing multiannual management plans in line with the MSY objective and set fishing opportunities at FMSY from 2015.
- While we welcome the use of the precautionary approach for several categories of data limited stocks without MSY estimates, the Commission states that it will do so in “a systematic, predefined and transparent way” but provides no explanation of how it will be done. This needs to be clarified before proposals are published.
- For deep-sea stocks, we welcome the commitment to following the precautionary approach and the UNGA Resolutions, thereby ensuring that catch limits are compatible with the long-term sustainability of stocks. We would like to remind you that the 2009 UNGA Resolution clearly states that when the scientific information available does not make it possible to

identify such sustainable exploitation rates, no fishing opportunities should be allocated for the fisheries concerned.

- In the context of the landing obligation, we applaud the clear statement that adjustments of fishing opportunities to account for fish previously discarded will not be done at the cost of reaching MSY. This is crucial if the EU is to rebuild stocks to MSY levels and adhere to the agreed timetable.

The Communication also attempts to provide an overview of the state of stocks in EU waters. While assessments are now available for more stocks, particularly in the Mediterranean, it also shows that the great majority of stocks in EU waters remain overfished and that even in the North-East Atlantic stocks did not improve much over the past few years. In addition, it is clear that while the co-legislators were discussing the new objectives of the CFP, the Council was ignoring these same ambitions in its quota setting. The difference between scientific advice and the agreed TACs actually increased sharply over the past 2 years.

- We therefore want to end by urging the Commission and the EU Member States to stand firm and implement the new objectives of the CFP by proposing and agreeing sustainable fishing limits for 2015 that will restore and maintain populations above biomass levels capable of producing MSY.

See Annex 1 for more detailed comments on the communication.

Yours sincerely,



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