

Stockholm & Brussels, 29 May, 2012

To: The Fisheries Ministers of EU Member States

Re: Input to the EU Fisheries Council Meeting, 12 June 2012

Dear Minister,

The Fisheries Secretariat (FISH) and Seas At Risk (SAR) have followed EU discussions on the reform proposals closely from the start. We are very concerned about the way some of the recent debates have evolved, and would like to take this opportunity to make some final comments ahead of the Danish attempt to secure a preliminary agreement (General Approach) at the Council meeting next month. If you are committed to securing a reform that will repopulate our seas and enable a profitable and viable fishing sector, we ask you to carefully consider the key issues highlighted below.

1. Getting the objectives right

Fundamental to this 10-year reform of the Common Fisheries Policy (CFP) is a positive vision for the EU fisheries sector and the core objectives needed to get there. In order to increase profitability and create more jobs in fisheries, we need actions that will rebuild fish stocks, ensuring that we do not take more out of the seas than they can replenish. This will require some sacrifices in the short term, but the sooner the steps are taken, the sooner the benefits can be seen.

It is true that for several stocks we would not be able to reach a biomass that allows the production of MSY (BMSY) by 2015 – the EU started implementation of the Johannesburg commitment too late. However, we can reduce the fishing mortality (F) straight away to a level that would eventually rebuild a stock to BMSY, by setting it lower than the estimated fishing mortality at MSY (FMSY). This management action, which is necessary if we want a viable and thriving fishing sector, can and should be taken now. For data poor stocks, proxies for Fmsy can be used, and in mixed fisheries, FMSY for the most vulnerable stock should be the basis for management. Delaying these necessary restrictions for years – to 2020 and beyond – will only result in a slower recovery, with a loss of jobs and potential profits as a result.

Publications by the OECD, the World Bank, the new economics foundation and the Commission all show that European fisheries would profit tremendously from stock recovery through increase of catches, larger profit margins, higher return on investment and creation of new jobs.

2. Minimise unwanted catches and ban discards

Discarding is a serious problem in the EU due to the use of unselective gear, conflicting regulations and high-grading. A fishery-based discard ban can be part of the solution. *However, the discard ban needs to be coupled to serious efforts to reduce unwanted catches in the first place, through gear modifications and other technical measures.*

When implementing the discard ban, we support the exclusion of species for which fishing is prohibited (protected), as well as of species for which there is evidence of high survival rates. No measures should be put into place which create a market for undersized and juvenile fish.

Even with “fully documented fisheries”, we do not believe that a landing obligation should automatically result in a higher TAC. Whether this is appropriate depends on whether the management targets for the stock have already been reached, such as MSY by 2015 as well as more ambitious long-term targets.

3. Regionalisation for more appropriate measures

This reform was going to bring a more regional approach to management of European fisheries; one better tailored to finding appropriate regional and local solutions to management issues. Enthusiasm for this concept seems to have cooled somewhat over the past few months, but even if the legal context presents challenges, a more regional policy is important for getting more detailed management right and doing it in a timely fashion.

The main vehicle proposed for regionalisation is multiannual plans (MAPs), and this is appropriate, but we sincerely hope that the current stalemate between Council and the European Parliament can be resolved quickly, as it will otherwise prevent timely regional management.

Based on successful management models elsewhere in the world, plans should be developed by stakeholder groups representative of the fishery which is the subject of the plan, including resource users, relevant Member States, scientists, control agencies, environmental organisations and other interest groups. For fisheries involving more than one Member State, Member States will need to co-operate at fisheries level to develop plans.

As proposed by a group of countries, a regionally developed proposal for a multiannual plan would then be submitted to the European Commission, which would assess whether, in the case of each plan, it meets the overall objectives and requirements of the CFP, and could be adopted by the Commission as a delegated or implementing act. It is essential that regional measures are set out in EU legislation to ensure coherence across the fishery and accountability.

4. The new European Maritime and Fisheries Fund (EMFF)

The EU provides substantial amounts of structural funds to the fishing sector, and from the recent Council debate it is clear that a majority of Member States wants to continue to do so. We call on ministers to consider that these are public funds and that their use must be for the public good, underpinning the conservation and management efforts set out in the CFP. In the current proposal, the vast majority of the available funding will be allocated to measures that often benefit a handful of operators rather than the entire sector.

In light of this, we welcome initiatives to set minimum amounts for spending on control and enforcement and data collection, and increasing the flexibility of Member State allocation of funds to this end.

We re-iterate the importance of not providing any funding to measures that increase or maintain the current overcapacity of European fleets; only fleets without excess capacity should be eligible for funding for vessels and gears. Funding for the building of new vessels should continue to be impossible under the new EMFF, and storage aid needs to phase out as planned.

See Annex 1 for more detailed comments on the current debate.

Yours sincerely,



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