

Stockholm & Brussels, 9 December, 2014

To: The Fisheries Ministers of the EU Member States

Re: Input to the EU Fisheries Council meeting, 15–16 December 2014

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 2015 the fishing opportunities for EU stocks in Atlantic waters (COM(2014)670). We ask you to consider our views during your discussions at the upcoming Council meeting.

We welcome the Commission proposal which is largely in line with scientific advice, but it really could have been stronger in its commitment to achieve F_{MSY} by 2015 and stock recovery.

This will be the first time that Atlantic and North Sea stocks are being managed under the reformed Common Fisheries Policy (CFP) with its MSY objective. Unfortunately scientific advice based on MSY is available for less than half of the 47 stocks you will be discussing. It will also be the first time that pelagic stocks fall under the landing obligation.

It is your responsibility to ensure that these two fundamental targets for 2015 – achieving F_{MSY} by 2015 and successful implementation of the landing obligation for pelagic stocks – are achieved. The extent to which this happens will be a measure of the Council's commitment to the recently agreed targets and, ultimately, sustainable and more profitable fisheries.

Regarding the fixing of fishing opportunities for 2015, we call on you to:

- Follow the available MSY advice and ensure an end of overfishing by 2015 in line with the CFP objective, even when this results in great quota reductions. A TAC higher than the one corresponding to F_{MSY} can only be considered in cases where clear arguments are provided showing that a TAC at F_{MSY} for 2015 would seriously jeopardise the social and economic sustainability of the fleets involved in that fishery.
- Follow the Commission proposals for pelagic stocks and do not increase the TACs to compensate for estimated discards, as this would undermine the objective of the landing obligation to avoid the catch of unwanted species.
- Follow scientific advice for data limited stocks without MSY assessment, or the more precautionary proposals from the Commission for some stocks.
- Review the Council Decision from 2013 in which 26 stocks are subject to TAC roll-over, as many of these TACs are not in line with the new CFP objectives.
- Establish individual TACs for each species or species group based on the advice provided by ICES, and specifically for different species of skates and rays.

We also recommend that you:

- Improve data collection in order to ensure a reduction in the number of stocks for which assessments are affected by data gaps
- Introduce bycatch reduction measures for demersal fisheries with particularly high discard levels in 2015, in order to facilitate a successful implementation of the landing

obligation for these stocks in January 2016. Also ensure that the reporting requirements for catches and discarding already in place are followed.

- Align the management units for the TACs with the units used in the scientific advice, which will significantly facilitate MSY-based management of these stocks.

See Annex 1 for more detailed comments on the fishing opportunities for Atlantic stocks for 2015.

Yours sincerely,



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