

Stockholm & Brussels, 27 October, 2014

To: The Fisheries Ministers of the EU Member States

Re: Input to the EU Fisheries Council Meeting, 11–12 November 2014

Dear Minister XX,

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 and 2016 the fishing opportunities for Union fishing vessels for certain deep-sea fish stocks (COM(2014)613). 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. As with all other EU decisions on fishing possibilities this autumn, this will be the first time that deep-sea species are being managed under the reformed Common Fisheries Policy (CFP) with its MSY objective. Achieving a high sustainable long-term yield will be a particular challenge with deep-sea species, as they are generally slow-growing, late-maturing and have a low reproductive capacity, which makes them particularly vulnerable to overfishing, especially when there is limited scientific knowledge.

Moreover, in deep-sea fisheries, and particularly bottom trawl fisheries, bycatch levels are high and catches contain a wide range of species, resulting in significant impacts on these non-target species and on the wider deep-sea environment. As the ecosystem-based approach is also enshrined in the CFP, we ask you to consider this when setting fishing opportunities.

In the proposal, many of the 54 deep-sea species listed in the proposal for a revised deep sea access regime (COM(2012)371) are missing, leaving them unmanaged and unregulated. In addition, the management of deep-sea stocks is still hampered by mismatches between management units and the areas assessed by the scientific bodies. We urge you to consider this as well in your deliberations.

As setting TACs alone is not sufficient to ensure sustainable fisheries and protecting deep-sea ecosystems, we also urge you to finalise the negotiations on the deep-sea access regime (COM(2012)317) and adopt a Council position in the coming weeks.

Regarding the fixing of fishing opportunities for individual species, we recommend:

- Alfonsinos: follow the Commission proposal of 280 tonnes;
- Orange roughy: Follow the Commission proposal and do not allow any targeted fishery;
- Red seabream: Follow scientific advice and do not allow any targeted fishery in areas VI, VII and VIII; limit the TACs in areas IX and X to 115 tonnes and 400 tonnes respectively;
- Greater forkbeard: given the gaps in the scientific survey data, apply a more precautionary approach than the Commission and agree on roll-over of the TACs;
- Black scabbardfish: follow scientific advice and set the TAC to 2 802 tonnes;
- Roundnose grenadier: follow scientific advice and close all targeted fisheries in area III and set fishing opportunities to 1 862 tonnes in areas Vb, VI, VII.

See Annex 1 for more detailed comments on the deep-sea fishing opportunities for 2015–2016.

Yours sincerely,



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