

Stockholm & Brussels, 2 May, 2012

To: The Fisheries Ministers of EU Member States

Re: Input to the EU Fisheries Council Meeting, 14–15 May 2012

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we send you our recommendations for the upcoming Fisheries Council, on two key parts of the ongoing reform of the Common Fisheries Policy: the objective to manage harvested species at the Maximum Sustainable Yield (MSY) and the proposed European Maritime and Fisheries Fund (EMFF) – we understand that the Council will be discussing Articles 15–17 on allocation of resources specifically. 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.

1. To restore and maintain populations above levels which can produce MSY (COM(2011)425)

A reformed CFP has the potential to end overfishing, while significantly contributing to the EU 2020 Strategy by transforming coastal communities into centres of sustainable development. Healthy fish stocks help prevent biodiversity loss and result in higher and more consistent catches at a lower cost. Restoring and maintaining fish stocks at levels above MSY would therefore improve employment in fisheries and related industries. A recent study found that restoring 43 European stocks to levels that can produce MSY would generate 3.53 million tonnes of additional landings and could support around 100,000 new jobs.

We therefore urge you to support the following objectives for the reformed CFP:

- to restore and maintain populations of harvested species above levels which can produce the Maximum Sustainable Yield (MSY) by 2015 (Article 2(1));
- to ensure that the fishing mortality rate is immediately reduced to levels that will restore and maintain populations of all harvested species above levels which can produce MSY by 2015, and to set a timetable for achieving these population levels for each stock for which production at MSY by 2015 is biologically impossible; and
- to implement the precautionary and ecosystem-based approach to fisheries management (Article 2(2) and 2(3)).

We also call on you to amend the Commission's proposal to ensure that:

- environmental sustainability is understood as a prerequisite for healthy and economically viable fisheries;
- once sustainable objectives for abundance levels are set, Council does not have the opportunity to exceed scientific recommendations; and
- measures under the CFP contribute to achievement of the objectives of the Marine Strategy Framework Directive, in particular Good Environmental Status.

See Annex 1 for the OCEAN2012 position on the objectives of the CFP and MSY.

2. Allocation of funds and the European Maritime and Fisheries Fund (EMFF) (COM(2011)804)

The proposed European Maritime and Fisheries Fund (EMFF) is supposed to make EUR 5,370 Million available to support 1) sustainable development of fisheries, aquaculture and fisheries areas, 2) control and enforcement measures and 3) measures on data collection. The regulation also proposes to earmark specific financial resources for the different areas of support.

The proposed funding priorities fail to make the structural shift needed to ensure that public aid is used exclusively for creating public goods and services, and do not reflect the needs of the sector. In fact, the vast majority of the available funding under shared management (EUR 4,535 Million) will be allocated to measures which often benefit a handful of individual operators rather than the entire fisheries sector or society at large, while financial support for control and enforcement (EUR 477 Million) and data collection (EUR 358 Million) is too limited.

There are a number of concerns about several structural measures aimed to support individuals or groups of operators, rather than the entire fisheries sector. The proposal also fails to address the problem of existing overcapacities, by including a number of structural measures, such as on board investments or gear replacement, often associated with maintaining overcapacities.

At the same time, scientific advice is inadequate for about two-thirds of the EU fish stocks under total allowable catches. Providing scientific data on fisheries is a responsibility of Member States and public aid could support better compliance with the data collection framework regulation and help to enhance the knowledge base of fisheries management.

To improve the provision of funds under Article 15, we call on the Council to:

1. *Allocate more funds for data collection and research*, in order to improve information on data poor stocks. This is in the interest of the fishing sector at large and would contribute to sustainable fishing;
2. *Double the amount of funding for control and enforcement*. Illegal, unreported and unregulated (IUU) fishing depletes fish stocks, destroys marine habitats, distorts competition, puts honest fishers at an unfair disadvantage, and weakens coastal communities within and outside the EU. In the last two years, the Council has adopted two new regulations to strengthen control and enforcement and to fight IUU practices. Adequate implementation of these regulations partially depends on the availability of financial resources; and
3. *Enable Member States to invest additional resources in public goods and services*. The proposal earmarks financial resources for the different funding areas, but does not allow Member States to shift additional resources from structural measures into data collection or control and enforcement. Minimum amounts of funding should be allocated for data collection, as well as for control and enforcement measures.

See Annex 2 for a joint NGO position on the proposed European Maritime and Fisheries Fund.

Yours sincerely,



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