To: Members of the EP Opinion committees to EMFF (BUDG, EMPL, ENV, REGI)

Copy to:
- Baltic EU Fisheries Ministers
- MS administration (Perm Reps)
- Fisheries Committee of the European Parliament
- European Commission DG Mare
- Council Secretariat

Date: 16th October 2013

Subject: On the future use of the European Maritime and Fisheries Fund (EMFF)

Dear MEP,

We are writing to you in connection with the forthcoming vote on the European Maritime and Fisheries Fund (EMFF) at the European Parliament plenary on 23 October.

Several Regional Advisory Councils have written to you to ask you to put your weight behind securing as full an allocation of money to data collection as possible. We would like to support this initiative.

In the Baltic Sea, we are at an advantage: we have relatively few fish stocks and data availability is better than in any other regional sea in the EU. Even so, there are a number of data poor stocks in the Baltic, and some unanswered questions related to species interactions. When the revised CFP enters into force, it is clear that the demands for reliable data will increase. In addition, broader EU policy initiatives such as the Marine Strategy Framework Directive (MSFD) and the Marine Knowledge 2020 project, require further data collection. Reliable data is needed in order to have a successful management of the Baltic Sea fisheries.

Fisheries organisations, anglers, NGOs and Member States are working together to manage the Baltic fish stocks in a sustainable way through collaboration in the BS RAC, BALTFISH and projects such as LOT1 on improved selectivity. The development of sustainable fishing in the EU will require good knowledge of our seas, our ecosystems, and our fisheries and other activities. This implies the need for a well-funded and coordinated approach to data collection in EU.
• So the BS RAC asks you to ensure that the budget earmarked for data collection under Article 15.4 is at or above the level proposed by the European Commission: equal to a minimum of 358 million Euros.

• We also think it is extremely important for Member States to have the necessary flexibility to shift additional funding if necessary from other measures in the regulation to data collection activities.

Yours sincerely,

Reine J. Johansson
Chairperson of the BS RAC

Ewa Milewska
Vice Chairperson of the BS RAC
LDRAC RECOMMENDATION ON

AN INCREASED BUDGET FOR DATA COLLECTION UNDER THE FUTURE EMFF

Status: approved by the Executive Committee

Originally drafted in English

Reference: R-08-13/WG5

Following the agreement on a ‘full general approach’ on the upcoming European Maritime and Fisheries Fund (EMFF), the Long Distance RAC (LDRAC) kindly asks the EU Fisheries ministers and Members of the European Parliament to reconsider the proposal to reduce the amount earmarked for data collection (Art. 15.4).

The fisheries where European long-distance fleets are active often suffer from a lack of data that hampers a reliable scientific assessment of the status of the resources and impacts of fishing activities. As the EU fleet has to operate in a transparent way, it is advisable to reinforce the information on catches under Fisheries Partnership Agreements (FPAs). While we appreciate the efforts ICES has made to provide assessment and management advice for data-limited stocks in EU waters, these methods are often not applicable to EU activities outside EU waters.

Furthermore, in the context of the upcoming landing obligation, the need to acquire reliable data on discard levels in the various fisheries of the EU fleets operating outside EU waters is unmistakable.

Fishing industry organizations, fisheries managers and civil society organizations must combine efforts to ensure the environmental and socio-economic sustainability of the exploitation of marine resources in the long term. The LDRAC has made significant efforts to establish good relationships with non-EU stakeholders, in particular with COMHAFAT. Such cooperation would also profit from greater availability and accuracy of data to improve assessments of stock status and applicable management regimes by sharing available knowledge. In this respect, a reduced budget for data collection will be detrimental for the fisheries under the remit of the LDRAC.
The development of sustainable fishing practices by EU fleets, and possibly other fleets operating in the same areas, requires adequate knowledge of marine ecosystems, and fishing and other activities, which depends on a reliable and extensive data collection system in the EU.

- For all the reasons stated above, the LDRAC asks to withdraw the proposal to reduce the budget earmarked for data collection under article 15.4, compared to the initial proposal of the European Commission, and keep the budget at least at €360 Mio Euro.
- We further ask to consider increasing the amount for data collection above this budget of €360 mio, or to provide Member States with the opportunity to shift additional funding from measures under Article 15.2. to data collection activities.

Proposed recipients: Fisheries Ministers

Copy to:

- Member States administrations
- Fisheries Committee of the European Parliament
- Opinion committees to the EMFF (BUDG EMPL ENVI REGI, to all their member MEPs)
- European Commission, DG Mare
Dear Ministers,

Following your agreement on a ‘full general approach’ on the upcoming European Maritime and Fisheries Fund (EMFF), the Regional Advisory Council for the Mediterranean (RAC MED) would kindly ask you to reconsider your proposal to reduce the amount earmarked for data collection (Art. 15.4).

The fisheries in Mediterranean waters suffer from a lack of data that hampers their scientific evaluation and often does not allow assessments to be conducted using the best science available. Furthermore, in the context of the
upcoming landing obligation, missing reliable data on current discard levels were repeatedly noted. This means that STECF and the Scientific Advisory Committee of the General Fisheries Commission for the Mediterranean (SAC/GFCM) will face severe challenges to provide suitable advice on the total amount of catches in future assessments.

Fishery organizations, Member States and NGOs are combining efforts to manage Mediterranean stocks in a sustainable way by collaborating within the frame of national project and also with the GFCM. Additional efforts are envisaged to apply a multi species approach to these waters that will require appropriate data. Additionally, being aware of future data requirements such as data needed for the Marine Strategy Framework Directive (MSFD) or for the project Marine Knowledge 2020, a reduced budget for data collection will be detrimental not only for the fisheries of the RAC MED.

Development of sustainable fishing in the EU will require good knowledge of our seas, our ecosystems, and our fisheries and other activities, which implies a strong and solid data collection in EU.

- For all the reason stated above, the RAC MED asks you to withdraw your proposal to reduce the budget earmarked for data collection under article 15.4 compared to the initial proposal of the European Commission and at least keep it at 360 Mio Euro.
- We further ask you to consider increasing the amount for data collection above this amount, or to provide Member States with the opportunity to shift additional funding from measures under Article 15.2. to data collection activities.

**Origin of the opinion:** Opinion already adopted by SWWRAC, and being adopted by other RACs, validated by the RAC MED Executive Committee in its current form via written procedure on 20.09.2013

Copy to:

- MS administration
- PECH (Fisheries Committee of the European Parliament)
- Opinion committees to EMFF (BUDG, EMPL, REGI)
- EC DG MARE
The North Sea Regional Advisory Council

European Council
Fisheries Secretariat DGB3
Rue De La Loi 175
B-1048 Brussels
Belgium

Cc: Director General DG MARE

11th October, 2013

Fisheries Ministers of the Council of the European Union,

EMFF Funding Allocation for Data Collection

The North Sea Regional Advisory Council (NSRAC) would like to add to the concerns already expressed by the NWWRAC, LSRAC, SWWRAC and MedRAC regarding Art 15.4 of the proposal for the Regulation for a European Maritime and Fisheries Fund (EMFF) for 2014-2020.

The Executive Committee of the NSRAC are concerned that the Council decision in July recommends a revision to the budget allocation for data collection (344,609,000 Euros) which is significantly lower than the initial funding proposed (358,000,000 Euros). We would ask that the decision to allocate a lower level of funding to data collection is reconsidered.

Many fisheries suffer from a lack of data that hampers their scientific evaluation and often does not allow assessments to be conducted using the best science available. ICES
has made provisions for assessments for data limited stocks, but still many stocks are governed under the precautionary approach, whereas better data could lead to improved fishing opportunities.

Furthermore, in the context of the upcoming landing obligation missing reliable data on current discard levels are repeatedly noted. This means that ICES will face severe challenges to provide suitable advice on the total amount of catches in future assessments. A multi species approach to demersal fisheries management will also require appropriate data. Additionally, being aware of future data requirements such as data needed for the Marine Strategy Framework Directive (MSFD) or for the project Marine Knowledge 2020, a reduced budget for data collection will seriously hamper the implementation of this.

Given these priority areas we would like to ask that you withdraw the proposal to reduce funding for data collection under article 15.4 of the EMFF Regulation.

Yours sincerely,

[Signature]

Mr Niels Wichmann
Chairman
NSRAC Executive Committee
Dear Fisheries Ministers at the Council of the European Union,

The North Western Waters RAC (henceforth, NWWRAC) welcomes that the proposal of Regulation for a European Maritime and Fisheries Fund (EMFF) for 2014-2013, on its Art 15.4, has effectively increased the amount earmarked for data collection in comparison to the data collection framework currently in place.

However, following the Council agreement on a ‘full general approach’ on the EMFF, the NWWRAC would kindly ask you to reconsider your proposal, resulting in a reduced amount earmarked for data collection (344,609,000 euros) in comparison with that included in the Commission’s initial proposal (358,000,000 euros).

The mixed fisheries in North Western Waters [ICES subdivisions (EC) Vb, VI and VII] suffer for many species from a lack of (quantitative and qualitative) data that hampers their scientific evaluation and it often does not allow assessments to be conducted using the best science available. The issue of data collection has been central to NWWRAC’s work for a number of years, including a NWWRAC initiative to address data deficiencies for demersal stocks in ICES subdivisions VI and VII, which drew recognition and support both from ICES ACOM and the Directorate General of Maritime Affairs and Fisheries of the European Commission, being expressly mentioned at the EC Communication on Fishing Opportunities for 2014.1

Development of sustainable fishing activities in the EU requires good knowledge of our seas, our ecosystems, and our fisheries as well as other marine activities, all of which depend on strong and solid data collection. Data rich stocks do not need to be governed under the precautionary approach and could eventually lead through a sound management to higher fishing opportunities.

For all the reasons stated above, the NWWRAC urges you to withdraw your proposal to reduce the budget earmarked for data collection under article 15.4 of EMFF Regulation compared to the initial proposal of the European Commission.

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1 Communication from the Commission to the Council concerning a consultation on Fishing Opportunities for 2014 - COM/2013/319 final – see title 2. "State of the stocks"
We further ask you to consider increasing the amount for data collection, or to provide Member States with the opportunity to shift additional funding from measures under Article 15.2. to data collection activities.

We look forward to hearing from you soon.

Yours sincerely,

Bertie Armstrong
NWWRAC Chairman

In copy:
DG MARE representatives
Members of the European Parliament Fisheries Committee and Opinion Committees to EMFF (BUDG, EMPL, ENV, TRAN, REGI)
SWW RAC advice 77 on financing data collects in the future EMFF

Following your agreement on a ‘full general approach’ on the upcoming European Maritime and Fisheries Fund (EMFF), the South-Western Waters RAC (SWW RAC) would kindly ask you to reconsider your proposal to reduce the amount earmarked for data collection (Art. 15.4).

The fisheries in south-western waters suffer from a lack of data that hampers their scientific evaluation and often does not allow assessments to be conducted using the best science available. While we appreciate the efforts ICES has made to provide assessments for data-limited stocks, data rich stocks don’t need to be governed under the precautionary approach and could lead to higher fishing opportunities.

Furthermore, in the context of the upcoming landing obligation missing reliable data on current discard levels were repeatedly noted. This means that ICES will face severe challenges to provide suitable advice on the total amount of catches in future assessments.

Fishery organizations, Member States and NGOs are combining efforts to manage SWW stocks in a sustainable way by projects such as GEPETO. Additional efforts are envisaged to apply a multi species approach to these waters that will require appropriate data. Additionally, being aware of future data requirements such as data needed for the Marine Strategy Framework Directive (MSFD) or for the project Marine Knowledge 2020, a reduced budget for data collection will be detrimental not only for the fisheries of the SWW RAC.

Development of sustainable fishing in the EU will require good knowledge of our seas, our ecosystems, and our fisheries and other activities, which implies a strong and solid data collection in EU.

- For all the reason stated above, the SWW asks you to withdraw your proposal to reduce the budget earmarked for data collection under article 15.4 compared to the initial proposal of the European Commission and at least keep it at 360 Mio Euro.
- We further ask you to consider increasing the amount for data collection above this amount, or to provide Member States with the opportunity to shift additional funding from measures under Article 15.2. to data collection activities.

**Origin of the opinion:** Opinion proposed in the meeting of the Executive Committee in Paris July 18 2013 and validated in its current form via written procedure on 30.08.2013

**Contributions:**
- Elise Petre          Fisheries Officer, WWF France
- Rita Sa             Fisheries Officer, LPN Portugal
- Javier Lopez        Marine Scientist, Oceana Spain

**Written and summarized by:**
Björn Stockhausen     Fisheries Policy Officer, Seas At Risk, Belgium
Dear ministers,

The Pelagic RAC welcomes that the proposal for the European Maritime and Fisheries Fund (EMFF) for the coming years in its Art 15.4 has effectively increased the amount earmarked for data collection in comparison to the data collection framework currently in place. However, following the Council agreement on a ‘full general approach’ on the EMFF, the Pelagic RAC would kindly ask you to reconsider your proposal, resulting in a reduction of the specific amount earmarked for data collection (EUR 344,609,000) in comparison with that included in the Commission’s initial proposal (EUR 358,000,000).

Although relatively well studied compared to many other stocks in EU waters, because of their widespread occurrence, the pelagic fisheries in general suffer from limited data, which hampers their proper scientific evaluation. This limits the possibilities to establish well defined harvest control rules in long term management plans. The pelagic sector is advancing substantially on these plans, but is regularly facing the limited capacity of science to advice on further steps.

Furthermore, the Pelagic RAC proposes that you provide Member States with the opportunity to shift additional funding from measures under Article 15.2 to data collection activities.

A similar opinion has already been adopted by other RACs.

Yours sincerely,

Verena Ohms
Executive Secretary Pelagic RAC