

Stockholm & Brussels, 29 October 2013

To: The Fisheries Ministers of the EU Member States

**Re: Input to the triologue on the European Maritime and Fisheries Fund (EMFF)**

Dear Minister,

On behalf of Seas At Risk (SAR) and the Fisheries Secretariat (FISH), we send you our views on the EMFF, with regard to funding for data collection and the flexibility of Member States to shift money towards data collection. The Regional Advisory Councils (RACs) have discussed these issues and unanimously approved advice on these matters.

Across Europe, fisheries management is suffering from a lack of data that prevents scientific bodies from providing robust and reliable advice. In addition, the implementation of MSY for all stocks and the introduction of a discard ban have created additional demands for data collection under the reformed CFP.

Despite the efforts of, for example, the International Council for the Exploration of the Sea (ICES) to provide the best available advice, 50% of stocks in the North-East Atlantic and adjacent waters are data limited while the situation is even worse for the Mediterranean and Black Seas. Moreover, within all EU waters, only 51 of 195 stocks are currently managed at or below Fmsy.<sup>1</sup>

The RACs - multistakeholder bodies including sector representatives as well as other stakeholders - also recognise the need to improve data collection in the EU. Many of the RACs have been developing projects to improve management plans on a regional level and are dependent on the availability of good quality data. In the past months, all seven RACs discussed and supported a funding level for data collection in line with or higher than the Commission proposal for the new European Maritime and Fisheries Fund (EMFF), and six out of seven also asked the co-legislators (Council and European Parliament) for one-way flexibility making it possible for Member States to shift money from other areas (e.g. structural measures) towards data collection.

In its plenary decision on 23 October, the European Parliament (EP) acknowledged the need for increased funding for data collection and re-prioritised the different funding streams, agreeing to double the amount available for data collection compared to the original Commission proposal. The EP plenary also voted in favour of introducing flexibility for Member States to shift additional funding towards data collection.

Taking into account the recognised needs by **ALL** stakeholders active on the various levels of European fisheries management, we ask you to:

- reconsider your proposal to reduce the budget earmarked for data collection under Article 15.4 and instead increase (and potentially double) the amount for data collection; and
- provide Member States with the flexibility to shift additional funding from measures under Article 15.2 to data collection.

*See Annex 1 for all the RAC letters with regard to data collection under the EMFF.*

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<sup>1</sup>Communication from the Commission to the Council concerning a consultation on Fishing Opportunities for 2014. COM(2013)319 final.

Yours sincerely,



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