

Stockholm & Brussels, 16 January, 2013

To: The Fisheries Attachés of EU Member States

**Re: [Input to the Council Working Group Meeting on PECH vote](#)**

Dear Fisheries Attaché,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR), we send you some comments on the recent Fisheries Committee amendments on the proposal for a regulation of the European Parliament and of the Council on the Common Fisheries Policy (doc. 5232/13 PECH 9 CODEC 51 – the Rodust report) in advance of your discussions tomorrow.

In December, the Fisheries Committee of the European Parliament took a momentous step towards turning the tide on overfishing in Europe by agreeing on a range of ambitious and well-designed amendments to the proposed new basic regulation of the EU Common Fisheries Policy (COM(2011)425). We commend this draft report and also the opinions of the Environment, Development and Budget Committees of the European Parliament.

In light of this vote and the previous Council agreement on a General Approach to this same proposal in June 2012, we urge you to carefully consider many of the amendments in the draft report and, in particular, provisions that will:

- 1) require action to **end overfishing no later than 2015** (FMSY), in order to recover fish stocks to sustainable levels (BMSY) by 2020 at the latest (e.g. Art. 2.2 and Art. 10.1) and **minimize impacts** on the marine environment (e.g. Art. 2.3, Art. 7, Art. 7 a (new), Arts 12 and 14);
- 2) **promote selective, low-impact and small-scale coastal fishing activities** (e.g. Art. 3 (d), Art. 3 (fa), Art. 7 (d) and Art. 8);
- 3) introduce provisions that will make **EU subsidies** to EU Member States and operators **conditional on compliance** with the rules of the CFP (e.g. Arts 50 and 51);
- 4) **reduce excess fishing capacity** in order to eliminate a significant driver of overfishing (e.g. Art. 2.4a, Art. 11 (ba) and Art. 34); and
- 5) introduce **regionalised management solutions** through the swift implementation of “multiannual plans”, with a view to improving data collection, ecosystem-based management and stakeholder participation (e.g. Art. 4 (aa), 4 (d) and Art. 9).

Regarding the rebuilding of fish populations to levels above those capable of producing the MSY, the Parliament has chosen a speedier approach, which we ask you to consider favourably. In addition, the Fisheries Committee has strengthened the provisions for more environmentally-friendly fisheries practices, and we hope that you can support the Parliament’s proposals in this regard. On the issue of fishing capacity, the Parliament has chosen to take a similar approach to that of the Council. We hope that here too, you will find common ground.

On the issues of increased regionalisation of the policy, we would like to express our support for the Council’s General Approach on article 17 for its clear focus on the need for regional

collaboration and **joint recommendations**. However, we urge you to **reconsider** the proposed introduction – by both the Council and the Fisheries Committee – to introduce a range of new Advisory Councils, additional to the originally proposed Aquaculture Council and Black Sea Council, for funding, capacity and logistical reasons.

Yours sincerely,



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