

Stockholm & Brussels, 06 December, 2012

To: The Fisheries Ministers of the EU Member States

**Re: Input to the EU Fisheries Council Meeting, 18–20 December 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 regarding the European Commission's proposal for fixing for 2013 the fishing opportunities in EU waters (COM(2012)608). 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.

We would like to state our general support for the Commission's proposal and its underlying approach. Therefore, we urge you to base your decisions for the 2013 fishing opportunities on the following general principles:

- that catch limits are in line with scientific advice from ICES and STECF, applying  $F_{MSY}$  for stocks for which this mortality level has been established;
- that existing long-term recovery/management plans are followed, provided that they are consistent with the MSY framework, or at least the precautionary approach;
- that catch limits are reduced for stocks of which the status relative to (proxies of) MSY is unknown.

We re-iterate the need to align EU fisheries management areas with the ICES assessment areas and functional units, in order to enable better application of scientific information to management. This is especially important in the case of nephrops in southern waters. Given that increasingly data is not available for certain stocks, such as southern hake and nephrops, we want to emphasise once more the need to improve data availability, and hope that the current review of the data collection framework will contribute to this.

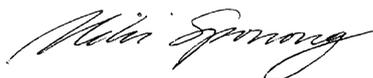
Due to the large number of stocks covered by this proposal, we have chosen to limit our detailed recommendations to a few species which in our opinion require particular attention.

- For **cod**, we call on you to close the targeted fishery in the Irish Sea (VIIa), the Kattegat (IIIa East), West of Scotland (VIa), as well as the Faroe Plateau and Faroe Bank (Vb1 and Vb2). As a reduction of the high levels of bycatch of juvenile cod is crucial for the recovery of cod stocks, we also urge you to adopt complimentary management measures such as the mandatory use of the best available selective gears, real time closures and closures of mixed fisheries as soon as one of the TACs has been exhausted.

- For **haddock**, we ask you to follow the Commission proposal and set a TAC of 3 100 tonnes for West of Scotland (VIa) and Faroes waters (Vb), and to ensure that no targeted fishery takes place in Faroes waters in order to protect the spawning stock biomass that has been decreasing since 2003.
- For **anglerfish**, we urge you to follow the TAC reductions proposed by the Commission and reduce the TAC by 16% for areas VIIIc, IX and X, not exceeding 2 090 tonnes for the combined species, taking into account the vulnerable nature of European anglerfish species and the uncertainty in data on these stocks.
- For **sole**, we urge you follow scientific advice and set a zero TAC in the Irish Sea (VIIa) in order to protect the remaining spawning stock biomass and prevent significant impact on benthic communities by beam trawling. We also call on you to support the Commission proposal for a TAC of 3 000 tonnes in the Bay of Biscay (divisions VIIIa and b), in order to achieve FMSY by 2013.
- For **southern hake** in divisions VIIIc and IXa, we urge you to follow scientific advice on transition to the MSY framework and set a TAC of 10 600 tonnes.
- For **nephrops**, we ask you to follow the Commission proposal, which is in line with the scientific advice, and set the TAC to 3 200 tonnes in VIIIabde and to zero in VIIIc, as well as in areas IX and X, until management units are adapted to the functional units used in the scientific advice. In addition, we ask you to consider the mandatory use of the best available selective gears to minimise the bycatch of juveniles and other commercial species.

*See Annex 1 for more detailed comments on fishing possibilities in EU waters for 2013.*

Yours sincerely,



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