

Stockholm & Brussels, December 2, 2011

To: The Fisheries Ministers of EU Member States

Re: Input to the EU Fisheries Council Meeting, 15–16 December 2011

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 a Council Regulation fixing for 2012 the fishing opportunities for certain fish stocks and groups of fish stocks, applicable in Community waters and, for Community vessels, in waters where catch limitations are required. 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. It is based on management plans, where in place, largely follows scientific advice for stocks where advice is provided and contains reductions for stocks for which there is a lack of scientific advice. If adhered to, it would take the EU some steps on the way to more sustainable fisheries and attainment of international targets.

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. When fixing fishing opportunities, we urge you to base your decisions on the following general principles:

- that catch limits are in line with scientific advice from ICES and STECF;
- that the agreed fishing limits enable the EU to fulfil the WSSD target of rebuilding stocks to sustainable levels, reaching maximum sustainable yield (MSY) by 2015;
- that existing long-term recovery/management plans are followed, when evaluated to be consistent with the precautionary approach.

We also support the Commission's overall ambition to address the issue of how to better manage 'data poor' stocks. However, further distinctions between the different categories of 'data poor' stocks that exist would be useful; for some stocks no data are available, for others the available data indicates a stable trend, and finally for some stocks the available data indicate a negative trend. Regardless of category, no increases in TACs should be agreed for data poor stocks.

We would also like to emphasize that in the future, EU fisheries management areas need to be aligned with the ICES fishing areas and functional units in order to enable better application of scientific information to management.

Regarding specific species, we would like to make a few recommendations. For **cod**, an economically important target species, which is also often taken as bycatch and affected by high levels of discards, we ask you to consider the following:

- To stop all targeted cod fishing in the Kattegat and the Irish Sea and, unless the use of selective gears in fisheries targeting other species becomes mandatory in order to reduce the bycatch and discarding of cod, any fisheries in these areas taking cod as bycatch should be closed in order to enable rebuilding of stocks.
- Make selective gears such as the eliminator trawl for fisheries targeting whitefish and sorting grids in trawls targeting nephrops mandatory in all fisheries where cod is a common bycatch. Without such measures, some cod stocks may never recover.
- Considering the poor state of the cod stocks in West Scotland, the Faroe Plateau and the Faroe Bank, we advise you to follow the Commission's proposal for these stocks.

We would also like you to consider recommendations for a number of other species:

- **Southern hake** (divisions VIIIc and IXa) is finally showing signs of recovery. We urge you to follow the current recovery plan and support the Commission's proposal for a 15% increase of the TAC to 12,299 tonnes.
- Due to the uncertainty in data for **European anglerfish** and the vulnerable nature of these species, we ask you to ensure that the 25% reduction in TACs proposed by the Commission for several areas is followed. For areas VIIIc, IX and X, a rollover would be more appropriate in order to safeguard the weaker anglerfish species caught in that fishery.
- We urge you to consider the weakest stock within a management area when agreeing on fishing possibilities for **nephrops**. We call on you to support the Commission's proposal for 15% cuts in areas VIIIa, b, and e. For the areas VI, Vb, VII, we ask for a 25% cut. We urge you to follow scientific advice and apply a zero TAC in area VIIIc, and for areas IX, X and CECAF 34.1.1 (EU) we also urge a zero TAC because of the critical state of nephrops in functional units 26–27 of area IX.
- Most **nephrops** stocks in EU waters show signs of decline and the exchange of individuals between areas can be very limited. We ask you to ensure that future management is based on the functional units used in the scientific assessments, in order to make full use of the scientific assessments and advice.
- For **sole**, we advocate a total ban in VIIa, as the stock is at a critically low level and there is no sign of recovery, and a 25% reduction in the TAC for divisions VIIh–k. Regarding division IIIa, subdivision 22–24, we ask you to follow scientific advice and reduce the TAC to 610 tonnes. For areas VIIIa and b, scientific advice should be followed resulting in a TAC of 4,000 tonnes. We support the Commission's proposal to reduce the TAC by 15% in divisions VIIb and VIIc, and finally for the areas VI, XIV, EU and international waters of Vb and XII, VIIIc–e and IX, a 25% cut in TAC would be appropriate.

See Annex 1 for more detailed comments on fishing possibilities in EU waters for 2012.

Yours sincerely,



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