

Stockholm & Brussels, 25 April 2013

To: Members of PECH – the Committee on Fisheries at the European Parliament

[Re: Input to the Fisheries Committee vote on the EMFF report on 10 July 2013](#)

Dear Committee Member,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR), we send you our views on the proposal for a regulation of the European Parliament and of the Council on the European Maritime and Fisheries Fund (COM(2011)804), and the draft report by MEP Alain Cadec (EPP, FR). In your preparation for the vote and the on-going discussions on compromise amendments, we ask you to carefully consider our recommendations.

We have chosen to focus on what are in our view the most relevant issues, if we are to ensure that future public funding does not contribute to overcapacity and overfishing, but instead support the transition towards sustainable fisheries and healthy marine ecosystems.

1. Fleet renewal

The use of public funds for fleet renewal, modernisation, engine replacement and scrapping would seriously undermine efforts to make EU fisheries more sustainable since they will likely exacerbate the existing overcapacities in European fisheries.

- We therefore ask you to *reject* amendments 48, 54, 55, 75, 88, 98, 100, 116, 634 and 717.

If the aim of support for fleet renewal is to improve the economic viability of the small-scale fleet, it is more effective to provide priority access to fishing opportunities for the socially and economically most sustainable part of the fleet, in line with the Parliament's vote on the basic regulation.

- We therefore call on you to *support* amendments 1208, 1215, 1220, 1226, 1231, 1237 and 1241.

2. Fleet assessments prior to EU investments in fishing vessels

EU subsidies must no longer contribute to maintaining overcapacity. Adequate assessments of the balance between fishing capacity and available resources on a fishery-by-fishery basis are needed to ensure effective fleet management.

- We call on you to make such fleet capacity assessments a general pre-condition for all financial aid targeting fishing vessels by *supporting* amendments 69, 486, 605, 664, 732, 757 and 804.

3. Conditionality

In order for the EMFF to support the implementation of the CFP, the agreed framework for financial aid must be consistent with the rules of the CFP. Financial aid must not be provided to Member States and operators that fail to comply with the rules of the CFP and other relevant legislation, nor to operators that have been involved in IUU activities.

Both the Commission proposal and the plenary vote on the basic Regulation of the CFP recognise the importance of conditionality and cross-compliance.

- We therefore ask you to *support* the Commission proposal (Article 11 and 12[1]c, as well as Annex III) and amendments 732, 754, 2123, 2352 and 2442.

4. Funding priorities for data collection and enforcement

Insufficient data and a lack of enforcement measures for existing regulations have been the cause for a decline in the amount and quality of information available for stock assessments of late. At the same time, the majority of funds in the future EMFF are earmarked for structural measures, such as fleet renewal, modernisation, storage aid and temporary cessation. These measures run counter to several of the objectives of the CFP as well as the wider aim of re-orienting EU subsidies toward benefitting society as a whole rather than only some actors.

- We call on you to *support* a shift of aid from structural measures to data collection, as well as control and enforcement, and to allow Member States the flexibility to allocate more resources to these areas if necessary, by voting in favour of amendments 817, 819 and 2212.

5. Selectivity and low-impact fisheries

To reduce the impact on non-target species and avoid unwanted bycatch, the future EMFF should support the development and implementation of selective gear, as well as sustainable fishing behaviour.

- We therefore ask you to *support* amendments 1217, 1278, 1279, 1280 and 1284.

6. Fuel subsidies

State aid for fuel (including through direct price support) reduces the operational costs of fisheries, and results directly or indirectly in an increase in fishing effort and thereby overfishing. Even fuel tax exemption is a hidden subsidy; it distorts the competition between large-scale, fuel-intensive fishing vessels and small-scale vessels using passive gear.

- We ask you to *oppose* amendments 17, 39 and 130, which aim to introduce mutual funds to cover income losses due to fuel price increases.

[See Annex 1 for more detailed comments on the proposal and the parliamentary debate.](#)

Yours sincerely,



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