



ASSOCIATION OF NATIONAL ORGANISATIONS  
OF FISHING ENTERPRISES IN THE EU



PEW Charitable Trust  
Ms. Rebecca W. Rimel  
901 E Street NW Washington,  
DC 20004 - 20008

9th April 2015

**Re: The real impact of activities on fisheries policy**

Dear Ms. Rimel,

We are writing to you on behalf of Europêche, the main representative body for the fishing sector in the European Union, representing 80,000 European fishermen and EAPO, the European Association of Fish Producers Organisations. We have for a long time observed the increasing activity of PEW in influencing the development of the Common Fisheries Policy (CFP) in European fisheries legislation. We welcome all activities which help to make sustainable use of the ocean and its resources yet are concerned about certain approaches that have been taken. A stronger engagement with the industry would allow for a more broad-minded picture of the fisheries sector when carrying out your operations, which would otherwise have serious inadvertent knock-on effects; not only for our fishermen but for fisheries across the globe.

The EU has some of the most regulated fisheries in the world and huge progress has been made by the industry itself to make stocks healthy and abundant. The radical overhaul of the CFP was concluded in 2013 and its implementation is well on its way to having sustainable fisheries in Europe by 2015, where possible, and by 2020 at the latest. Even before CFP objectives were in place, we already experienced a huge improvement in fish stocks. In fact, in the Northeast Atlantic, the percentage of overfished stocks has reduced from 94% in 2005 to 41% in 2014, the

number of stocks within safe biological limits has almost doubled in the last decade and 27 stocks are already fished at MSY levels<sup>1</sup>.

Despite this positive development, PEW has just launched a report on *"Turning the Tide: Ending Overfishing in North-Western Europe"* this month. Even though we already have a strict timeline in place to achieve MSY targets, the report focuses solely on the hasty application of the concept, a model which is intended to ensure a high and stable commercial utilisation of the fish stocks - different from the precautionary approach which is intended as a conservation measure. A singular MSY focus should be used as intended and should certainly not take priority over other measures. Furthermore, even according to ICES, we are already on track: "Fishing mortalities have declined towards Fmsy and stocks are increasing slowly"<sup>2</sup>. Not only do publications such as this undermine all the hard work and progress of the sector but such heavy investment could have been better spent on other areas of fisheries policy where there is more work to be done.

The first phase of the landing obligation has recently come into force and there is no doubt that the sector will face a difficult transitional period. The presence of your organisation in the bringing about of the discards ban has not been reproduced when it comes to its implementation and how to make the ban workable in practice. We have heard very little on your ideas of how the ban will work in mixed fisheries, how inter-species quota will work and solutions for monitoring and control. Here, you could have a real input in working with the sector to help find solutions to the practical problems of what you had been so intensively promoting.

Similarly, we believe that the strong lobbying of your organisation has sometimes been either counter-productive or misplaced. For example, after an intensive environmental lobby-led campaign in the European institutions to postpone the Fisheries Partnership Agreement (FPA) between the EU and Mauritania, the tough conditions of European fishing in Mauritanian waters were made so uneconomic that the companies significantly reduced their activities and many even withdrew. As a result, the Chinese fleets were able to enter into an agreement and build fish meal factories on the coast. Now the fish, formerly brought to African markets as food, is used for Chinese aquaculture as fish feed, which is certainly not a victory for the oceans nor for sustainability. One cannot seriously argue that this outcome is a victory for conservation and human rights, the reasons brandished by your organisation as motives to change FPAs.

Part of your work has been aimed at establishing large marine protected areas (MPAs) as a one-size-fits-all fisheries management tool. It goes without saying that the very nature of a no-take zone would guarantee an unchanged ecosystem since fishing operations would no longer be taking place. In localised and coastal areas, they can indeed be success stories. However, drawing a line in the ocean does not offer much protection since many areas involved migratory species; MPAs only protect what they contain. They shift fishing effort to other areas and do not address issues such as oil, pollution and invasive species. In addition, whilst with these measures fishing activities are restricted, other potentially harmful economic activities can be allowed in the area (transport, sport fishing, dredging, wind-farming and mining), causing doubt within the sector as to what the motives really are. Inevitably, arbitrarily closing off huge sections of our own seas will lead to the import of more fish, on top of the approximate 70% we already import

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<sup>1</sup> [http://ec.europa.eu/dgs/maritimeaffairs\\_fisheries/consultations/fishing-opportunities-2015/doc/com-2014-388\\_en.pdf](http://ec.europa.eu/dgs/maritimeaffairs_fisheries/consultations/fishing-opportunities-2015/doc/com-2014-388_en.pdf)

<sup>2</sup> [http://ec.europa.eu/fisheries/news\\_and\\_events/events/20140926/doc/kirkegaard\\_en.pdf](http://ec.europa.eu/fisheries/news_and_events/events/20140926/doc/kirkegaard_en.pdf)

from third countries who do not always comply with the strict standards our EU fishermen meet. A fish that is imported is a fish that is not consumed in its natural market. Such drastic measures to close up swathes of the ocean should be on a case by case basis, based on science and seen as a last resort; and certainly not an aspiration.

Furthermore, we witnessed a huge lobby campaign, spearheaded by the PEW-coordinated Shark Alliance, relating to the removal of shark fins on board vessels which led to a fins attached policy under the pretext that the carcass was thrown away. But the reality was that the EU fleet was commercialising the carcasses, being the target portion of the Portuguese and Spanish fleets within the EU, to both the internal and South American markets. Separation of the fin from the body on board was taking place mainly to allow the processing onboard of the meat to then discharge upon landing. Not only was there no evidence to suggest finning had even taken place by the European fleet, but the EU fleet was one of the few on a global level exploiting the fishery respectfully yet your advocacy efforts focused on a strict EU fins attached policy.

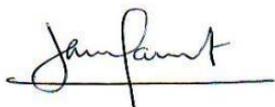
Throughout the process, our complaints and cries of warning from our members as to the inefficiency of the proposed measures and the possibility once again, of the undesired knock-on effects were seemingly ignored. The measures had no damaging effect for non-EU vessels who are not subject to them and who are still able to sell their products on international markets, thus only making those fleets stronger as the EU's slowly vanished. PEW continuously matched our arguments with the promise to focus all their efforts on promoting the same rule of fins attached in all fora, including on an international level yet this has simply not happened. It appears the issue is not relevant on your agenda anymore. The result is that a non-existent practice has been banned in the EU, while the problem still persists in other waters, as evidenced by the last ICCAT negotiations. An active engagement with the industry would have ensured more workable solution was found which would not have unfairly lead to a loss of employment in the EU fishing fleet, more costly processing and a loss of competitive advantage in comparison to 3<sup>rd</sup> countries well known for the practice of finning.

As you are aware, PEW is a Member of various Advisory Councils (ACs) which were established to involve EU stakeholders in the fisheries sector more closely in the decision-making process. Through these type of fora, the parties concerned can establish a dialogue and cooperate in the development of fisheries policy and implementation. Whilst it cannot be said for many PEW-funded organisations, PEW themselves have indeed provided some constructive contributions in certain ACs. In others, PEW have taken a somewhat combative approach to negotiations often falling back on to stereotypical stances allied to past lobbying streams. However, it has become apparent that in all cases, PEW do not bind themselves to the proposed recommendations. To actively participate in discussions finally resulting in a non-committal approach to any sort of compromise is not helpful in forging real and workable compromises and certainly hinders any progress.

Our members are already taking part in a whole range of research initiatives on marine litter, control and enforcement, gathering scientific data, selectivity and conservation and safety and training. As European producers, we are always able and willing to bring our advantage of experience into rational and strategic discussions based on facts and findings. It is our

intention to build an active and constructive relationship with your organisation, as we have done with other EU based NGOs, mostly in the framework of the ACs and we sincerely hope that you are willing to engage with the sector to work together towards sustainability of European fisheries.

Yours sincerely,

A handwritten signature in blue ink that reads "Javier Garat". The signature is written in a cursive style and is underlined with a single horizontal line.

Javier Garat  
President of Europêche

A handwritten signature in blue ink that reads "Pim Visser". The signature is written in a cursive style and is underlined with a single horizontal line.

Pim Visser,  
President of EAPO