



**EUROPÊCHE RESPONSE TO THE EUROPEAN COMMISSION'S CONSULTATION ON FISHING
OPPORTUNITIES FOR 2017 UNDER THE COMMON FISHERIES POLICY (CFP)**

Identification number: 2312395253-25

1. About Europepêche

Europepêche, the Association of National Organisations of Fishery Enterprises in the European Union, was founded in 1962 and is regarded as the most important EU-wide representative of the catching sector. Europepêche is the European organisation of shipowners, fishermen and employers that today counts 14 member organisations from 9 European countries. Europepêche aims to improve the competitiveness of EU fishing enterprises, the development of responsible and sustainable fishing activity and the promotion of training, health and safety at sea and fight against illegal fishing.

2. Introduction

The European Commission has launched its annual consultation on setting fish quotas for 2017. This fishing opportunities consultation will take into account the CFP objectives of maintaining fish stocks above biomass levels capable of producing maximum sustainable yield (MSY). This objective is to be reached by 2020 against a back drop of achieving Good Environmental Status (GES) also by 2020, as part of the Marine Strategy Framework Directive (MSFD).

Fishing opportunities are based on the best available science from the International Council for the Exploration of the Sea (ICES) and the Scientific, Technical and Economic Committee for Fisheries (STECF). For stocks where advice is unknown or limited, the precautionary approach is applied.

3. Maximum Sustainable Yield

As a preliminary remark, Europepêche notes it is the fishermen who are the most interested in the good status of the stocks and must be at the core of EU fisheries policy. Therefore, the European Commission should not only focus on the political objective of reaching MSY within the given time frame but should also put emphasis on the three pillars of sustainability (economic, social and environmental) when recommending the fishing opportunities for 2017.

The Commission Communication COM (2016)396 final states that the objective of reaching MSY by 2020 should be completed within the shortest feasible time-frame. However, this should not be carried out at the expense of the fishing sector.

The objective of reaching MSY is already challenging to fishermen. The Commission therefore should not propose any change to management measures that have no added value or that have not been

piloted to test their usefulness. The MSY objective as well as the discard ban is incentive enough to fish sustainably without an added system of management.

We urge the Commission to take into account the vulnerability of the fishing sector to the new changes in the CFP. In the same way that there is a red line of biological safe limits that cannot be crossed, there should also be a similar gauge for the social and economic limits to safeguard the sector.

It must be noted that huge progress has been made by the industry itself to make stocks healthy and abundant. The definition of overfishing has evolved from meaning stocks below the safe minimum to meaning stocks not yet at MSY levels. The misleading terminology has led to a deep-rooted critique of the sector. What would once be considered healthy is now considered overfished. Even by the new definition, a decline in the number of 'overfished' stocks has been seen and more stocks are being fished at MSY; 38 stocks from 19 species are currently fished at MSY¹ compared to 21 in 2014. The sector is ready and willing to continue collaborating with scientists to manage these stocks through a multiannual plans. Europêche reiterates their commitment to achieving MSY levels in the shortest possible time-frame. Nevertheless, there must be room for flexibility, since the new CFP allows for much-needed leeway with respect to this target, which shall be obtained by 2020 at the latest.

4. Discards

Fishing opportunities for 2017 will also be set against the backdrop of a challenging period of adjustment for our fishermen to adapt to the new objectives. Since January 2015, we have seen the first phase of the introduction of the discard ban. We have also seen the new range of technical measures to be introduced, proposing a more regional approach to fisheries management. Europêche believes that there must be room for flexibility in order to achieve these core objectives within the next 4 years. Any significant cut in quota will affect the long term profitability of the sector and given this apparent stock recovery, would be unjustifiable.

We also urge for flexibility to mitigate the negative effects of the discard ban, in particular regarding choke species. We have a situation where the quota allocation fails to deal with the complexity of mixed fisheries. Fish will remain uncaught, reducing food supply and vessels will either be tied up or have already gone bankrupt. Therefore, we ask for the Commission to ensure the practical implementation and full use of measures in the CFP such as realistic uplifts in quota and close monitoring and frequent choke analyses.

5. Socio-economic Impact

The state of fish stocks are improving due, in part, to improved sustainable fishing gears to enhance selectivity as well as to the sacrifices made by the sector with reduced effort and capacity. These measures have subsequently led to reduced levels of employment, a decrease in sales and a loss of competitiveness. This must be transmitted to the consumer who should make their informed and sustainable choice based on all factors, not solely the environmental pillar. The consumer must be aware at all times that not only is the fish part of an abundant stock but that the fishing sector behind the catch is also sustainable.

¹ "Common Fisheries Policy - Towards sustainability of all stocks: June 2016 status", DG MARE

According to a recent study by Seafish², if all assumptions come true, by 2019 the UK whitefish fleet would be receiving just 28% of the revenue they achieved in 2013. The situation is even worse for the UK nephrops fleet, which, in the worst-case scenario, would receive just 5% of 2013 revenue

In this way, fishing opportunities should not solely be set in line with the wish to be at FMSY and below MSY Btrigger. It should reflect the observed development in the stock and take account of the fact, that it forms the basis for the provision of food, jobs and the continued existence of vulnerable local fishing communities.

6. Scientific Advice

Europêche urges that fishing opportunities must be better adapted to the state of the stocks given that scientific knowledge is constantly improving. Nevertheless, Member States should be encouraged to provide, where possible, the scientific data to help improve knowledge of all European stocks. This situation works to the detriment of the fishing sector given the fact that, in cases where scientific advice is limited or unknown, the precautionary approach is applied in line with Article 2.2 of the CFP. This could result in a situation where the stock is relatively healthy but due to its unknown state, the quota allocation is reduced. The Commission should bear in mind the socio-economic consequences of the lack of scientific advice given that fishermen are unduly penalised. Europêche therefore encourages the Commission and Member States to make full use of the funds available within the new EMMF to improve the knowledge of fishing stocks in their waters.

The use of recreational fisheries data in scientific advice should also be questioned. The future of small-scale fishermen, who are given an explicit preferential status in the CFP, would suffer considerably since including recreational fisheries data actually allows a free, unaccounted and substantial recreational fishery to develop. For example, ICES have advised the recreational catch of western Baltic cod to be 61% higher than that of the commercial catch, effectively basing their advice on something, that whilst covered by the CFP, is not actually regulated by the CFP. In this respect, more data is resulting in less accurate catch advice which should never be case in achieving sound fisheries management. Instead, member States should decide the recreational catch for their own fishermen. The advice on recreational mortality should be included in the advice for natural mortality since the latter is also unregulated and therefore they can be both categorised together.

7. Multiannual Plans

We have seen the first multiannual plan on the Baltic adopted in June which will set the tone for sustainable long-term management plans in other marine regions to be proposed by the Commission. These plans will also facilitate decentralised decision-making for technical measures. The future plans must allow for flexibility regarding improving stocks and should create a stable management of fish stocks allowing the sector to invest and plan in the long-term The nature of the plan must not detract from the fact that rapidly improving stocks must be reflected in increased quota and always based on up to date and accurate scientific advice.

² Seafish Fleet Economic Performance Dataset 2006-2015, http://www.seafish.org/publications-search?search=&category=Economics%20and%20Business&date_month=&date_year=&published_beforeafter=

8. Improving state of the stocks

The Commission also acknowledges the improved situation in many stocks in the North East Atlantic, including among others, mackerel, northern hake and most stocks of herring in the North Sea, Celtic Sea, Irish Sea and the West of Scotland. In addition, saithe, plaice, haddock and nephrops in the Skagerrak are fished at levels consistent with MSY. Blue fin tuna stocks in the East Atlantic and Mediterranean Sea have also grown in recent years with reports that fishermen in the Mediterranean are exhausting their quota in a matter of hours.

At the Commission seminar on the 'State of Fish Stocks', July 2016, the scientific data presented an increase in the number of fish stocks being fished in accordance with MSY, more robust stocks and the prospect of higher yield. Many stocks have recovered and have delivered stable and sustainable catches showing that management over the years have been successful. Stocks such as northern hake, cod and plaice in the North Sea and sprat, herring and plaice in the Baltic have said to have flourished and across all ecoregions, a decrease in fishing mortality and an increase in stock levels has been observed for demersal, flatfish and pelagic stocks.

It is important to note here that some data for stocks such as sole in the Irish Sea and nephrops in the North Sea have shown a decrease in fishing mortality and catches of juveniles but in spite of these positive parameters, this has not been reflected in stock size. This means that when calculating fishing mortality, other factors have to be taken into account such as species interactions and other human activities and that if the best available scientific data cannot be interpreted adequately, this should not result in reduced quota.

9. Conclusions

We have been witness to a radical overhaul of the Common Fisheries Policy, bringing vast changes to the sector and far-reaching pieces of legislation which has impacted fishing operations. Such challenges and socio-economic disturbances must be taken into consideration when proposing the next series of fishing opportunities for 2017. It is in the best interests of the Commission to ensure the survival of the fishing industry and their rapid adaptability to the new changes which is essential to maintain the entire chain of fisheries production.

Scientists have recently highlighted positive trends in the state of fish stocks, notably in the North-East Atlantic. Fishing opportunities, therefore, must reflect the realities of stock recovery. In the absence of accurate and up to date scientific advice, the precautionary approach is of absolutely no benefit to the fishing sector. Member States should be encouraged to transmit scientific knowledge in order for ICES and STECF to have a complete overview of the state of the stocks in all European waters. A lack of data only translates to poor quota for fishermen.