



Commissioner Karmenu Vella,
European Commission,
Rue de la Loi 200,
1049 Brussels,
Belgium,

Brussels, 15th June 2016

RE: European fishing sector position on the revision of the GES Decision 2010/477/EU

Dear Commission Vella,

As you know, the European Commission is currently drafting a revision of the GES Decision 2010/477/EU laying down criteria and methodological standards on good environmental status (GES) and specifications and standardised methods for monitoring and assessment.

Our position paper, enclosed, outlines our concerns about the way the Commission envisage the environmental targets defined in the revision of the Decision document which will undoubtedly have a major influence on current and future fishing activities.

We are alarmed that the Commission propose in criterion 6 that 70% of the assessed habitats, including pelagics, is un-impacted, indirectly meaning closed for all human activities. This hugely disproportionate threshold would close good fishing grounds to fishermen who have vast knowledge of migration patterns and spawning areas and who rely on changing grounds based on resource availability. Any threshold used must be based on scientific evidence and a socio-economic analysis.

Fish stock abundance is affected by a whole range of environmental factors, which must be borne in mind when legislating complex fisheries policy. Additionally, regulation must be made with the intention of full workability yet if rules are set in such a way that they are both unrealistic and unjustified, they will be difficult to digest by the sector.

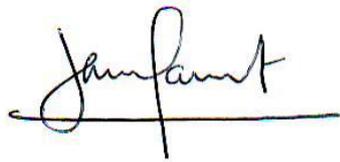
It appears that the Commission is cherry-picking advice to suit impossible and unjust goals at a time when there is still no clear understanding as to how criteria and environmental targets should be

made operational. We consider it essential for the relevant ICES advice not to be ignored, as seems to be the case, but to be fully utilised.

We urge you to revise these proposals which will have severe and unnecessary socio-economic costs on the sector and are wholly disproportionate.

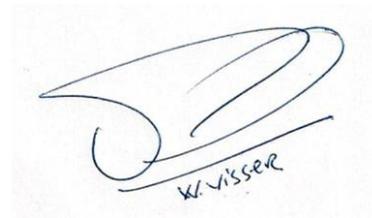
We look forward to your response.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Javier Garat", written over a horizontal line.

Javier Garat

President of Europêche

A handwritten signature in black ink, appearing to read "Pim Visser", written over a horizontal line.

Pim Visser

President of EAPO