



ASSOCIATION OF NATIONAL ORGANISATIONS
OF FISHING ENTERPRISES IN THE EU

1st October 2014

Re: Council position on EU Deep-Sea Fisheries Regulation

Dear Rt Hon George Eustice MP,

On behalf of all the members of Europêche¹, the association of national organisations of fishing enterprises in the European Union, I am writing to urge you to adopt a rational and realistic approach concerning the new European regulation on deep-sea fishing in the Northeast Atlantic (2012/0179(COD)), which will soon be debated by the Council. The proposal from the European Commission, published back in July 2012, aimed to phase out bottom trawls and bottom-set gillnets targeting deep sea species for European vessels operating on the high seas in the North-east Atlantic region.

It must be expressed from the outset that Europêche are fully supportive of contributing to more sustainable fisheries management of deep sea stocks. We fully adhere to the objectives of the Common Fisheries Policy (CFP) and strive to integrate these goals into our activities on a daily basis. However, a blanket ban on bottom trawling is outside the mainstream of management thinking, completely disproportionate to the objectives laid out in the CFP and would have serious socio-economic consequences for the European fleet. The proposal also failed to reflect ICES (International Council for the Exploration of the Sea) advice from their 2014 assessments and the scientific results from the EU's own projects of DEEPFISHMAN and CORALFISH EU.

The proposed ban was not in line with the management measures recommended by the North-East Atlantic Fisheries Commission (NEAFC) (a regional fisheries management organisation, responsible for the long-term conservation of stocks and the protection of the marine ecosystem) who advocate the freezing of the footprint² and the move-on rule³. These measures are based on a more rigorous distinction between target species and by-catch and between existing and new fishing areas, thereby posing no threat to the competitiveness or the economic survival of the sector. This could provide the basis of measures to be implemented at the EU level instead of a blanket ban approach.

¹ Europêche is a key stakeholder in maritime and fisheries affairs since it is the representative body for fishermen in the European Union representing around 45,000 vessels, both artisanal and large scale, 80,000 fishermen and counting 16 member organisations from 10 European countries.

² Restricting the geographical expansion of bottom trawling into currently unfished areas

³ Where vessels must move away if they encounter VMEs

Bottom-trawling is the only way of fishing for certain species such as megrim, anglerfish and Norway lobster and regarding northern European waters, the only viable way of fishing black scabbardfish, blue ling and roundnose grenadier, which are exploited in line with maximum sustainable yield (MSY) levels. The proposal would create an un-level playing field, putting EU vessels at a competitive disadvantage to non-EU vessels fishing in the same waters. It would be more appropriate to create a uniform standard of eco-system protection and to establish scientific criteria to determine possible restrictions to the use of bottom trawls in certain vulnerable areas. It must be noted that fishermen actually do not enter areas of deep-sea corals because of the damage to the gear and subsequent economic losses.

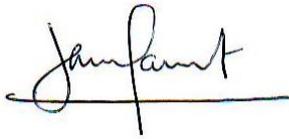
The fishing sector in the UK worked closely with WWF to protect vulnerable cold-water corals at Rockall Bank, and the EU sector is also working closely with the Joint Nature Conservation Committee (JNCC) and the Scottish Government to protect vulnerable ecosystems in the West of Scotland. These are very useful examples of how collaboration between stakeholders and fishermen delivers the necessary and commensurate protection. We should embrace such collaborative work and build on it.

The Commission has argued that fishermen should switch to long-lines in light of the blanket ban on bottom set gears. *Europêche* does not believe certain gears should be favoured over others. Displacing issues from one gear to another is not the solution. This suggestion is not only irresponsible but is highly uninformed and has devastating socio-economic consequences. A fishing method is more than just a gear type; it is a package of measures including a skill set and a business model. The skills required for every fishing method are distinctly different and require years of intensive training which would expose many fishermen to unwelcome risk and jeopardise their safety at sea. Skill sets are often geographical and cultural with centuries of knowledge transfer. They require different vessel types and specific vessel equipment, incurring a cost in the millions. Not only would this transition to long lines result in a colossal cost coupled with significantly reduced yields, but would lead to the certain annihilation of the deep sea sector.

The sector supports a more tailored approach to deep sea management; a specific problem requires a specific solution and not a one size fits all blanket ban. The Prince of Wales' own creation, the International Sustainability Unit, acknowledged that economy and ecology do not have to be locked in an irreconcilable struggle. In fact, they have to go hand in hand to provide for long-lasting and self-sustaining solutions; often overlooked by policy-makers.

The Council position should therefore reflect the European Parliament compromise which enables more sustainable fisheries management and safeguards economic stability, an essential factor given that one single job at sea represents 3.2 jobs onshore. The long term sustainable management of fish stocks requires intelligent regulation and not emotive, ill thought-out sweeping policies which have the potential to eradicate a sector and set a dangerous precedent.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Javier Garat', with a horizontal line drawn underneath it.

Javier Garat

President of Europêche