

Commissioner Stavros Dimas
Commissioner for Environment

Commissioner Joe Borg
Commissioner for Maritime Affairs and Fisheries
European Commission
B – 1049 Brussels

Friday, March 27, 2009

Re: Marine ecosystem considerations in climate change adaptation

Dear Commissioners,

in the context of your preparations for the Commission's white paper on adaptation to climate change, Seas At Risk, the federation of environment NGOs dealing with the protection and restoration of the marine environment, and Greenpeace would like to stress the importance of marine ecosystems in dealing with adaptation. Our seas and oceans hold a pivotal and complex role in regulating the planet's climate. Depending on the actions we take, they can help buffer the impacts of climate change or speed up the trends of global warming. The sea covers more than half of the EU territory. Therefore, developing and implementing effective marine and maritime policies is critical.

We are concerned that the current draft white paper neglects the need for adaptation policies with regards to maritime activities and the marine environment. Oceans and seas have been shown to warm up faster than land, which means that the effects of climate change will be felt earliest and strongest in the marine sphere. Ocean acidification is one of the consequences of rising levels of carbon dioxide in the Earth's atmosphere, but changes in temperature, salinity, stratification and oxygen¹ levels are equally worrying. The potential effects of these changing environmental conditions on marine ecosystems are not yet fully understood, and we support the white paper's view that more scientific knowledge is needed. However, we already possess enough information to start acting, as research is starting to demonstrate that acidified marine areas, for example, contain considerably lower biodiversity and biomass.²

While climate change is a worrying threat to the marine environment, marine ecosystems are already under severe pressure from human activities. Fisheries cause the most significant damage, by removing too much biomass, both of target and non-target species, from the system and by destroying vital habitats for the survival and reproduction of marine species. In addition, the fishing sector's own contribution to climate change is considerable – fisheries account for at least 1.2% of global oil consumption: an average of 1.7 tonnes of CO₂ are emitted for each ton of fish landed.³ Man made pollution, eutrophication, waste and introduction of alien species are placing additional pressure on the marine environment.

The only way to enhance the marine environment's capacity to adapt to a changing climate is to strengthen its resilience. Preserving diverse and abundant marine life is paramount to maintaining and strengthening this resilience.⁴

We fully support the white paper's assertion that “Priority should be given to adaptation measures

¹ For the impacts of anoxia, see EEA (2009), Fish out of Water. EEA Signals 2009 – Key environmental issues facing Europe, pp. 26-26

² Hall-Spencer, J. M. *et al* (2008), Volcanic carbon dioxide vents show ecosystem effects of ocean acidification. Nature 454, pp. 96-99

³ Thrane, M. (2006), LCA of Danish Fish Products: New Methods and Insights. Int. J. LCA 11

⁴ Brander, K. (2008), Tackling the old familiar problems of pollution, habitat alteration and overfishing will help with adapting to climate change. Marine Pollution Bulletin, Volume 56, Issue 12, December 2008, pp. 1957-1958

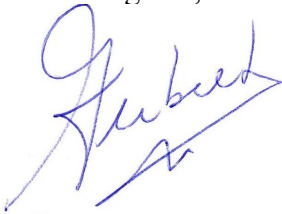
that will pay off in the short term irrespective of uncertainties in future forecasts. Priority should also be given to measures that are beneficial for both mitigation and adaptation”. This statement undoubtedly applies to fisheries policy. Removing the pressure of overfishing and destructive fishing will help recover the fish stocks on which the industry depends and contribute to both adaptation and mitigation: as generally speaking, the most destructive and least selective fishing methods are also the most fuel-intensive.⁵

The Marine Strategy Framework Directive provides the basic framework for achieving healthy ecosystems. However, its implementation deadlines may bring change too late. An effective EU strategy for climate change adaptation which takes the marine environment in due consideration must therefore entail:

- a clear objective to reduce overfishing, taking into account not only the removal of target species, but of non-target species as well;
- measures to ensure a shift from current fuel-intensive and destructive fishing methods such as beam and bottom trawling to more climate friendly, low-impact fisheries;
- measures to ensure a reduction of fishing pressure and habitat destruction, including a reduction and restructuring of the current fleet, with a view to obtaining a fleet using low-impact and less fuel intensive fishing methods;
- the integration of climate change adaptation in the upcoming review of the Common Fisheries Policy;
- a coherent network of marine protected areas of sufficient size and geographic distribution to grant species a safe haven, where they can be protected from human pressures;
- specific measures leading to reductions in pollution, eutrophication, litter, etc.;
- a clear commitment not to displace fishing effort to other stocks/species or other parts of the world, as this would cancel adaptation efforts made at EU level.⁶

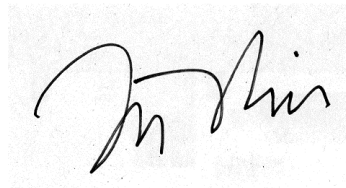
We trust that you will ensure that the final version of the white paper will not overlook the marine environment, as has unfortunately been the case in the latest draft. It is important that the Commission makes a clear commitment to propose adaptation policies directed at achieving clean, healthy and diverse seas.

With best regards,



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⁵ Seas At Risk (2008), Climate and the Oceans: the Carbon Footprint of Fisheries (brochure), <http://www.seas-at-risk.org/images/Carbon%20footprint%20brochure%20final%20final.pdf>

⁶ We find it of particular concern table 6 of the Commission Staff Working Document “Accompanying document to the White Paper on Adapting to Climate Change – Towards an EU framework for action”, where “switch to new species” and “increase imports” are mentioned as “Potential planned adaptation options for fisheries and aquaculture”.