

Stockholm & Brussels, December 3, 2009

To: The Fisheries Ministers of EU Member States

Re: Input to the EU Fisheries Council Meeting, 14–16 December 2009

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we offer you our views and key messages on the fishing opportunities for 2010 that will be adopted at the December Fisheries Council. The aim of our recommendations is to encourage a more sustainable utilisation of our common marine resources, and we hope that our views will be taken into consideration in your deliberations at the Council meeting.

1. Council Regulation fixing for 2010 the fishing opportunities for certain fish stocks and groups of fish stocks, applicable in Community waters and, for Community vessels, in waters where catch limitations are required

Due to the large number of stocks covered by this Proposal, we chose to limit our detailed recommendations to a few species, which in our opinion require particular attention (see Annex I). In addition, we provide brief recommendations on other stocks, whose status we consider problematic (summarised in the form of a table in Annex II).

When fixing fishing opportunities, we urge you to base your decisions on the following general principles:

- follow scientific recommendations from ICES at all times.
- ensure that fishing possibilities are in line with recovering and rebuilding stocks to sustainable levels, with an ultimate target beyond MSY.
- apply existing long-term management plans, when evaluated to be in line with the precautionary approach, and aim for the establishment of long-term management plans for all stocks in the near future.

Regarding specific species, we would like to make the following recommendations:

- Targeted cod fisheries in Kattegat, West of Scotland, the Faroe Plateau and the Faroe Bank, as well as the Irish Sea, should be closed and other catches minimised in order to enable rebuilding of stocks.
- The management plan for Southern hake has not been properly evaluated, its implementation has been poor, and there is currently a huge discrepancy between scientific advice and implementation of the plan. We urge you to apply the precautionary approach and support a 40% reduction in TAC for this stock.
- Regarding anchovy in the Bay of Biscay, we urge you to support the Commission Proposal, which is in line with scientific advice, and to keep the fishery closed until further data evaluated and endorsed by ICES indicate that the stock has recovered.
- Sharks, skates and rays are generally unsuitable targets for fishing because their low reproductive rate and other life history traits make them very vulnerable. Many shark and ray species are already hovering on the brink of extinction. We

urge you to follow the agreed Community Plan of Action for Sharks, as well as ban any landings of porbeagle, spurdog, angel shark, common skate, white skate and undulate ray.

See Annex 1 and 2 for more detailed comments on this proposal.

Yours sincerely,



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The Fisheries Secretariat (FISH) is a non-profit organisation working towards more sustainable fisheries on an international level, with a focus on the EU.



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Seas At Risk (SAR) is a European association of non-governmental environmental organisations working for the protection and restoration of the marine environment

We hope this communication is welcomed.
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