

Stockholm & Brussels, April 7, 2010

To: The Fisheries Ministers of EU Member States

Re: Input to the EU Fisheries Council Meeting, 19–20 April 2010

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we send you our recommendations on key issues for the upcoming April Fisheries Council: the reform of the Common Fisheries Policy and future decisions on long-term management plans (LTMPs). We ask you to support our recommendations in your deliberations at the Council meeting in order to ensure more sustainable utilisation of our common marine resources.

1. On the reform of the Common Fisheries Policy (CFP)

FISH and SAR are both members of OCEAN2012, an alliance of 59 organisations dedicated to transforming European Fisheries Policy to stop over-fishing, end destructive fishing practices and deliver fair and equitable use of healthy fish stocks. In view of the consultation on the Green Paper (COM(2009)163) and the European Parliament (EP) report on the Green Paper on the reform of the Common Fisheries Policy (2009/2106(INI)), we urge you yet again to support “a root and branch” reform of the CFP based on:

- Prioritising environmental objectives as a prerequisite to fulfilling social and economic objectives. The precautionary and ecosystem-based approaches to fisheries management must form the fundamental basis upon which fisheries management is built. *This is supported by the EP report.*
- Adopting a decision-making framework which ensures decisions are taken at the appropriate levels, differentiating between long-term strategic and operational management decisions, and in a transparent way, ensuring effective participation of stakeholders.
- Granting access to fishing resources – within and outside EU waters – based on environmental and social criteria, favouring less destructive fishing gear and practices, compliance with the law, low fuel consumption, decent working conditions and high quality products. *A gradual introduction of such access criteria is also supported by the EP.*
- Defining instruments and competencies which deliver sustainable fishing capacity at EU and regional level. This should include legally-binding and time-bound capacity limits per fishery, both in quantitative and qualitative terms.
- Phasing out of public aid that sustains overcapacity. Subsidies and other financial instruments should only be used in a way that serves the public good and support the transition to environmentally and socially sustainable fisheries. *A majority of EP members failed to acknowledge the established connection between fisheries subsidies and overfishing.*

For further details on our views, we have taken the liberty to include an OCEAN2012 discussion paper on the reform.

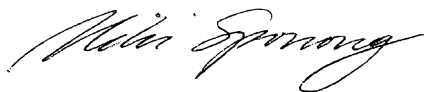
See Annex 1 for the OCEAN2012 discussion paper on CFP reform.

2. On Long-Term Management Plans

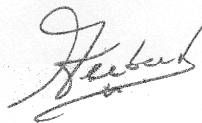
At the time of writing this, it looks unlikely that any long-term management plans (LTMPs) will be agreed at your meeting in April, as the European Parliament has not yet voted on them in plenary. However, we would like to emphasize the importance of LTMPs for EU fish stocks, particularly for overfished and sensitive stocks, and that plans need to be adopted in a timely manner also under the new co-decision procedure set out by the Lisbon Treaty. A number of additional proposals are expected from the Commission this year. We would like to make some general recommendations for LTMPs, as follows:

- In future, all European fisheries should be subject to LTMPs, best delivered on a regional basis, so that stakeholders who have an interest in the fisheries within that area can contribute to their management.
- We believe future LTMPs should be more inclusive and contain catch limits, as well as other suitable instruments such as effort limits, harvest control rules, technical rules specific to the stock, temporal and permanent closures, area closures, control measures and periodic review requirements.
- The concept of MSY is an insufficient goal for stock management, and should only be considered intermediate.
- Discards and high-grading have no place in fisheries with long-term management plans based on an ecosystem approach.
- There must be a flexibility in all long term plans to allow continuous revisions and rapid adjustments to new facts. Ways need to be found to make this possible under the co-decision procedure set out in the Lisbon Treaty.

Yours sincerely,



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