

Stockholm & Brussels, December 1, 2010

To: The Fisheries Ministers of EU Member States

Re: Input to the EU Fisheries Council Meeting, 13–14 December 2010

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we send you our recommendations for the upcoming Fisheries Council regarding the European Commission's proposal for a Council Regulation fixing for 2011 the fishing opportunities for certain fish stocks, applicable in EU waters and, for EU vessels, in certain non EU waters. 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.

We would like to state our general support for the Commission proposal, which overall is ambitious and would take the EU some steps on the way to more sustainable fisheries and attainment of international targets. Due to the large number of stocks covered by this proposal, we have chosen to limit our detailed recommendations to a few species, which in our opinion require particular attention (see Annex 1). In addition, we provide brief recommendations on other stocks, whose status we consider problematic summarised in a table (see Annex 2).

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

- that catch limits are in line with scientific advice from ICES and STECF;
- that the agreed fishing limits enable the EU to fulfil the WSSD target of rebuilding stocks to sustainable levels, reaching maximum sustainable yield (MSY) by 2015;
- that existing long-term recovery/management plans are followed, when evaluated to be consistent with the precautionary approach.

We would also like to emphasise the importance of establishing long-term management plans (LTMPs) for all stocks in the foreseeable future. However, a number of the existing plans have been shown to be ineffective. It is therefore paramount to ensure that new LTMPs are sound at the time of adoption, and not allow compromises that will make them obsolete from the beginning.

Regarding specific species, we would like to make a few recommendations. For **cod**, an economically important target species, which is also often taken as bycatch and affected by high levels of discards, we ask you to consider the following:

- Unless other measures are agreed to reduce the bycatch and discarding of cod in other fisheries, any fisheries in the Kattegat and the Irish Sea taking cod as bycatch should be closed in order to enable rebuilding of stocks.

- Make use of selective gears in all fisheries where cod is a common bycatch mandatory, such as the eliminator trawl for fisheries targeting whitefish and sorting grids in trawls targeting nephrops. Without such measures, some cod stocks may never recover.
- Follow the management plan for cod fisheries in the North Sea, Eastern Channel, Skagerrak and Community waters in the Norwegian Sea, corresponding to a TAC reduction of 20%, which is also in line with the ICES MSY transition scheme.
- Halt any directed fisheries for cod in West Scotland, the Faroe Plateau and the Faroe Bank, and ensure that the TAC of 120 tonnes suggested by the Commission is used allow for the fishing mortality caused by bycatch in other fisheries.

For **herring**, where the picture is more mixed, we urge you to ensure:

- that the TAC for herring in the Irish Sea is set no higher than 4,800 tonnes and that a management plan is developed for this area;
- that a TAC of no more than 13,200 tonnes is set for herring in Southeast Ireland, Little Sole, Great Sole and West Great Sole, in line with the long term management plan and the ICES MSY approach, even though SSB is at its highest since the 1960's;
- a zero TAC for herring in the waters West of Ireland, Porcupine Bank and South Irish Sea, as the Spawning Stock Biomass is considered likely to be below the level for risk of collapse;
- that the management plan for herring in the Faroes, Rockall and North-west Scotland is adhered to and that the proposed TAC of 22,481 tonnes for 2011 is agreed.


We would also like you to consider recommendations for a number of other species:

- For **plaice**, we ask you to ensure that the TAC in the Eastern English Channel remains at no more than 3,400 tonnes in 2011 and to support a continued seasonal fishing closure during the spawning season between 1 January and 31 March. We also urge you to reduce the TAC for the Western English Channel, resulting in landings below 647 tonnes.
- The recovery plan for **Southern hake** is largely considered a failure, due to a number of flaws in the plan as well as insufficient control and effort. We urge you to apply the precautionary approach and support a 9% reduction in the TAC for hake in the North and North-western Spanish waters and in the waters along the Portuguese coast. It is also important that a review of the management options is completed next year in order to address the huge discrepancy between scientific advice, management measures and the actual implementation of the plan.
- **Anglerfish** mature late and any catch is therefore likely to contain a high proportion of immature fish, making the stock susceptible to recruitment overfishing. We therefore ask you to ensure that TACs are reduced for all EU stocks of anglerfish.
- Most **nephrops** stocks in EU waters show signs of decline. We ask you to bring TAC:s down where needed, and above all to advocate mandatory use of selective gears as nephrops trawls are notorious for large amounts of bycatch of non-target species.
- As a precautionary measure, we ask you to ensure that the TAC for **anchovy** in Portuguese waters is not exceeding 4,800 tonnes.

- For **blue whiting**, we urge you to, as a minimum, follow the management plan, resulting in a TAC, non-EU states included, not exceeding 40,100 tonnes in 2011.
- We also ask you to ensure that total catches of **mackerel**, non-EU states included, are in line with scientific advice and do not exceed 646,000 tonnes in 2011.
- For **blue ling** West Scotland, Rockall Bank and Irish Sea, we urge you to go beyond the Commission proposal and ensure that no directed fisheries are permitted in 2011 and support efforts to limit bycatch in the mixed fishery. We also ask you ensure that the current fisheries closures are maintained in areas VIa and VII.
- **Sharks, skates and rays** are generally unsuitable targets for fishing because their slow reproduction 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 and to support the Commission proposal for zero TACs for several shark species. We also ask you to reduce the TACs on all species skates and rays in areas VI-IX, allow no increase in II-IV, ensure that there are no targeted fisheries for common skate, white skate or undulate ray and that bycatch for these species are not allowed until measures are in place to ensure long-term sustainability.

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

Yours sincerely,



Niki Sporrang
Director
Fisheries Secretariat (FISH)



Monica Verbeek
Executive Director
Seas At Risk (SAR)