

Stockholm & Brussels, July 13, 2011

To: The Fisheries Ministers of EU Member States

**Re: Input to the EU Fisheries Council Meeting, 19 July 2011**

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we send you our initial thoughts and recommendations for the upcoming Fisheries Council regarding the first package of proposals for CFP reform published by the European Commission.

This package, published on 13 July, sets out the Commission's ambitions for the reform, including a proposal for a new basic Regulation, a proposal for a new organisation of the market and further thoughts on the external dimension. It includes some significant improvements, but is not the radical reform proposal that we expected.

We welcome the inclusion in the proposal for a new basic Regulation of internationally agreed targets for the recovery of fish stocks – reaching levels above and beyond MSY by 2015 – that could see the end of overfishing in EU waters, if it receives the support from the European Parliament and the EU Member States. We urge you to support these important elements.

However, the proposal fails to adequately recognize the need for a healthy marine ecosystem as a prerequisite for viable fisheries and does not commit decisions on fishing opportunities to follow scientific advice.

We also welcome the encouragement of higher selectivity and the fact that the proposal partially addresses the wasteful practice of discarding perfectly good fish at sea. The move towards catch quotas instead of landing quotas is a very positive one, which we urge you to support, but we would rather see a full discard ban than the piece-meal approach taken by the Commission, applying the ban to only a few species.

The most radical element of the proposal is the mandatory requirement to institute Transferable Fishing Concessions (TFCs) to regulate access to resources – an area previously managed by Member States. While this may help to reduce overcapacity in the EU fleet, we are concerned about this blanket application of a single tool.

TFCs are not a conservation tool, and will not ensure sustainable fisheries without a number of other measures, including strict fishing limits and a high level of control and enforcement. It also fails to ensure that capacity reduction is addressed in a qualitative way, i.e. **ensuring** that the most unsustainable and damaging vessels are removed from the fleet, unless it is carefully implemented together with access criteria promoting environmentally and socially responsible fishing. TFCs should only ever be implemented within a framework of proper criteria and safeguards, rewarding those who fish in the most sustainable manner.

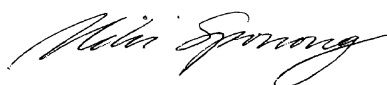
We would like you to consider this move to mandatory TFCs carefully, as it is a development that will be very difficult to reverse, and ask yourself whether retaining public control over the resource and for example lease it on relatively short term, using the income to cover management costs, is not a better option.

Finally, in terms of aquaculture, the indiscriminate promotion and development suggested by the Commission may lead to the same problems of over-establishment, environmental effects and poor profitability as in the catching sector. The reformed CFP must ensure that aquaculture develops to be a net producer of fish protein, and does not rely on or lead to the overexploitation of feed fisheries, if it is to contribute to future food security.

That said, this reform offers a unique opportunity to recover the well-being of European seas and fishing communities. The responsibility to ensure an effective reform now rests primarily with the Council and European Parliament. Your position will shape the future of our seas.

*See Annex 1 for OCEAN2012's first reflections on the CFP reform package.*

Yours sincerely,



*Niki Sporrang*  
Director  
Fisheries Secretariat (FISH)



*Monica Verbeek*  
Executive Director  
Seas At Risk (SAR)