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EAPO response to COM (2011) 298 – Consultation on Fishing Opportunities

As a member EAPO regrets that ACFA has not consolidated a response to the above mentioned consultation.

EAPO notes that this year's policy statement is not only for next year (2012) but also for the years thereafter. This statement is therefore more relevant and important than the policy statements of the preceding years.

EAPO considers a final document should be issued having taken account the views expressed during the consultation process. To do otherwise makes the process of consultation redundant.

EAPO assesses that the so-called eleven commandments stipulated in preceding policy statements are not withheld in this communication. Only three management categories are remaining for the Commission to set TAC proposals:

- As per existing Long Term Management Plans.
- Based on MSY targets (when compatible with scientific advice).
- Minus 25 % when insufficient scientific data.

In respect of the MSY target basis, it seems that the European Commission has decided to introduce a TAC based on MSY without a transition to the 2015 Johannesburg target. This is contrary to last year's policy statement and other earlier communications by the Commission. EAPO confirms having no problem with the MSY principle as set out in the Johannesburg Declaration, however we do envisage difficulties in its implementation particularly in mixed fisheries. Bringing forward the timing of the ultimate target means additional difficulties to reach this target.

The MSY concept aims at fishing at F_{msy} as an average over many years. It is therefore not required to achieve the target F_{msy} each and every year. Yearly results may be slightly under or over target without endangering the MSY principle. The Commission should not consider F_{msy} to be a 'limit', as in this concept it is crucial that F_{msy} is seen as a 'target'. When aiming at a fishing mortality lower than F_{msy} the results might be ecologically sustainable, but will not reach a maximum yield.

An example of this erroneous approach can be found in the Commission's consultation paper: the statement that North Sea herring is in line with MSY targets does not take into account that the stock is currently underexploited.

The proposal for a 25 % reduction in TAC when not enough scientific data are available is an affront to the fishing industry. EAPO for years has been asking to increase efforts to improve the situation for the 60 % of the stocks for which there are no or insufficient data. We were pleased to note that more intensive talks between industry and science had started to look at ways to improve this. Unfortunately it rapidly became clear that in view of the current economic situation the Member States are not inclined to accommodate the joint industry-science (and European Commission) request to foresee the means to achieve the improvement.

A straightforward reduction of TAC under a so-called precautionary approach will be in many cases completely opposite to the sustainability targets. Also other views on ways to reach this target, as put forward by stakeholders and the Commission itself, are being put aside. The impact of implementing this part of the policy will be the obligation for fishermen not to land catches for which no endangerment of the stocks or any other negative environmental impact is proven. This means promoting the discarding of perfectly consumable fishery products or creating a socio-economic disaster by needlessly forbidding fishermen to perform their job, when they would not be allowed to continue to fish.

For EAPO it is very disappointing to note that in the European Commission consultation paper there is no appreciation whatsoever of the work done by the stakeholders on the road to more sustainable fisheries. This also applies to the economic analysis in the consultation document. By using the results of the worst crisis year in the recent fishery economics history (2008), the Commission gives the impression that it has no respect whatsoever for the efforts the industry has made to reduce the impact of cost factors over which it has no control.

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