

## European Association of Fish Producers Organisations

## Association Européenne des Organisations de Producteurs dans le secteur de la pêche



**EAPO / AEOP**

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### Letter by e-mail attachment to:

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**EAPO21-12**

**Oostende, 25 January 2021**

Dear Ms. Aguilera,

**Subject:** EAPO position on CCTV on board fishing vessels

EAPO first wishes to affirm its commitment to sustainable fishing, respecting laws and regulations in place. Monitoring, control and surveillance are needed to ensure that those are followed by all. The EU seas enjoy an efficient and reliable fisheries management system guaranteeing sustainable fisheries. While respecting the specificity of each fishing fleet and fishing boat, the guaranty of a level playing field both internally and externally is very important in this context.

The use of cameras on board fishing boats (CCTV) is a controversial and very debated topic. The introduction of the landing obligation in the 2013 reform of the CFP seems to have fuelled the push for the use of CCTV. EAPO has already explained several times that this regulation is unfit for purpose. Its implementation is only hardly feasible thanks to the exemptions that are available. An increase of the control cannot in any way fix the issues of the landing obligation regulation that will need to be dealt with specifically.

The example of Norway rightly illustrate that CCTV is not needed to insure a that a landing obligation regulation is efficient. Norway introduced a landing obligation back in 1987. Since then, the Norwegian landing obligation has been successful without CCTV. In Norway, one of the reasons for not having camera surveillance on board fishing vessels is because of privacy concerns. In addition, camera surveillance of fishing vessels is deemed unethical. Rather than believing that total surveillance creates compliance, it was understood that the best guarantee for compliance is an understanding of why a policy is designed as it is.

In the debates around CCTV, a common example put forward is the large roll-out of cameras on board vessels in Canada, Australia and New-Zealand. It is important to point out that these fisheries are very different from the European context. Undoubtedly this is the case for vessel size and age, quota system and management, but also for the *métiers* present and the industry's structure. For all these reasons, EAPO does not think that examples from these "new countries" can be simply copy-pasted in the EU.

### ***CCTV is not a control tool***

In general, EAPO believes that CCTV should not be used as a control tool. CCTV cannot be used for control purposed for several reasons. First, it is not appropriate for all of the diversity of fishing vessels of the EU. When it comes to control, a level playing field has to be insured between all the fleets and CCTV doesn't allow for this. Second, in terms of implementation, CCTV use does not always comply with EU and national privacy laws, including constitutional protection of onboard employees, and with business confidentiality. Furthermore, it raises important questions on ethics and values that still need to be discussed. Third, there are issues in terms of storage of footage and doubts on who might be the recipients of the videos. This includes concerns about the access, security and ownership of the data, and the application of the General Data Protection Regulation (GDPR). Fourth, costs of installation, maintenance, replacement, and storage of footage of CCTV should not be overlooked. They again disqualify CCTV for a control usage that needs to be cost efficient. Finally, the huge amount of data that CCTV generates means that it is impossible to monitor it in its entirety. The automatic species identification is still not sufficient for distinguishing all species and morphologies. EAPO is concerned that the sampling and calculation process from video sample, via haul calculation to trip calculation (and onwards to fleet segment calculation) might present a distorted picture of fisheries operations.

### ***When could CCTV be useful?***

Notwithstanding the previous explanations, EAPO wants to contemplate the cases when CCTV might be implemented for specific purposes. CCTV may be useful for data collection and scientific purposes in some fisheries but should not serve any other objective than informing effective management. In addition, it might sometimes be considered valuable in certain fisheries, for crew safety purposes.

### ***Conclusion***

There is a need for further consultation with the fisheries sector on this topic. This is necessary to allow for an efficient and broadly followed measures to be put in place. The mistakes of the landing obligation cannot be compensated with further similar mistakes. The mandatory roll-out of CCTV will not suddenly make the landing obligation regulation workable nor will it prevent unwanted catches to reach the fishing nets. Reiterating what is stated in ACs advices, *"Control and enforcement are the*

*end stages of a process of compliance with a policy*". Instead of such top-down regulation, EAPO proposes to re-think the landing obligation regulation and incentivise work on by-catch mitigation.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'P. Visser', with the name 'P. VISSEER' printed in small letters below it.

EAPO President  
Pim Visser