

European Association of Fish Producers Organisations

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



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EAPO22-45

Oostende, 24 August 2022

EU Transparency Register number: 46491656228-65

## Towards more sustainable fishing in the EU: state of play and orientations for 2023

### ***EAPO Position***

*EAPO would like to insist on the low environmental footprint of European fishing products, and the role fishing has in ensuring food security. Both these elements make fish an essential protein source to meet the objectives set by the European Green Deal.*

#### Progress in achieving sustainable fishing in the EU

EAPO would like to thank the Commission for underlining the efforts made by European fishermen to further improve the stocks' sustainability and to commit to keeping them in good condition once a good status is reached.

Unfortunately, these efforts will be overshadowed by the increasing impacts of climate change on European stocks. According to a review of existing literature<sup>1</sup>, three potential responses from fish populations have been identified: distribution changes in space and time, productivity changes and adaptation. But the intensity of these impacts remains largely unknown and unpredictable.

EAPO asks the Commission to further improve research on climate change, to make sure the impacts are known.

<sup>1</sup> Projected impacts of climate change on marine fish and fisheries, *ICES Journal of Marine Science*, Volume 70, Issue 5, September 2013, Pages 1023–1037, <https://doi.org/10.1093/icesjms/fst081>

## State of the EU fleet

While we agree with the Commission's statement that catch capacity must be in balance with the productive potential of the fish stocks, in the context of energy transition, limiting the volume (Gross Tonnage) of a vessel only limits innovation. The new technologies require more space than conventional fuel engines for the same uses.

Moreover, European fishing vessels are on average 35 years old<sup>2</sup>, the design of today's vessels is different and more efficient than the designs of vessels from the preceding century.

European legislation must be adapted to ease the transition to low carbon emission fishing vessels and to ease their modernisation. EAPO asks the legislators to remove the gross tonnage ceiling to allow for the upgrade of European fishing vessels and the compliance with the objectives of the European Green Deal.

## Economic performance

The fishing industry has been facing an unprecedented crisis due to Russia's invasion of Ukraine caused by skyrocketing fuel prices. These fuel prices, as written in the Commission's communication, *"About 40% of the small-scale fleet, 66% of the large-scale fleet and 87% of the distant-water fleet would not be profitable if energy prices remain at the current level for the rest of 2022"*.

EAPO would like to thank the Commission for its quickness in addressing the problem through the Temporary Crisis framework with the increase of the direct aid ceiling up to €75,000, the amendment of the EMFF regulation and the use of article 26 of EMFAF. While these measures are temporary, they greatly alleviate the consequences of this increase.

## Landing Obligation

We would like to insist on the importance of existing exemptions for all our members, and we kindly ask the Commission to consider this when reviewing all existing exemptions in 2023.

Regarding mixed fisheries, they are, by nature, the ones most impacted by the landing obligation, through increasing sorting times and decreasing storage capacity onboard without any economic return.

Considering the current situation EAPO considers that further to a report on the CFP objectives the Commission is preparing by the end of this year, there should be a review of the set tools to reach those objectives, particularly of article 15 in the same CFP.

## Main messages and orientations for 2023 fishing opportunities proposals

Overall, EAPO would like to spotlight that the Fishing industry in the last 2 years has been facing major upheavals: Brexit, Covid 19, increasing commodity prices due to Russia's invasion of Ukraine, climate change and anthropogenic pressures impacting the species' resilience.

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<sup>2</sup> Average age of the vessels listed in the fleet register.

EAPO asks the Commission, in its yearly proposal, to use the upper  $F_{MSY}$  range when Biomass is greater than  $MSY_{trigger}$  as specified in the management plans, to reduce the economic impacts of the different upheavals faced by the industry. When preparing proposals for the Council and principles for bilateral and trilateral consultations, according to EAPO the Commission should take into consideration not only the most recent scientific advice, but also the comments on such advice coming from experienced experts, namely the fishers.

In that sense, EAPO Members are deeply concerned regarding the proposed change for the use of the upper range of the fishing mortality interval. So far, only one of the three conditions laid down in the Article 4.5 of the WW MAP have been used, to avoid a variation superior to 20% from one year to another, and then, to limit the socio-economic consequences of drastic fishing opportunities cuts.

EAPO insists on the importance this flexibility has for European fishermen, which is threatened by the change suggested by the Commission: “use the upper range of MSY levels for healthy stocks, on the condition that the scientific advice considers it necessary.” As ICES only performs forecasts, it will never consider the use of such a mechanism as necessary.

EAPO would prefer ICES ‘s work to focus on addressing the 2 other conditions, regarding the mixed fisheries and the intra or interspecies damages. It has to be recalled that underexploiting a fish resource leads to a decrease of the productivity of one stock, with further potential impacts to its preys.

Regarding stocks shared with third countries, recent negotiations on mackerel have shown the need for sharing agreements with Norway, Iceland, and the Faroes. Unilateral increases in quotas by individual Coastal State put the stock at risk of being overfished. EAPO would like further information on the toolbox the Commission mentioned to address unilateral quota setting by coastal states using the zonal approach.