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## **Comments on the European Commission's Document with the Policy Statement 2009 – Fishing Opportunities**

1. Overall EAPO finds that the Policy Statement 2009 is an extremely negative document and it gives a bad image to the fisheries scene. There appears to be an inertia in the Policy Statement as there is not a clear evolution when compared with preceding statement.
2. Specifically EAPO questions why it would be necessary to change the range of the limitations of TAC changes from 15 to 20 or 25 %. This decision can lead to a serious problem with the stability of the sector
3. It is noted that pelagic fisheries are not covered in the document. EAPO finds that there should be a specific section, particularly on the work being done on management plans (Horse Mackerel, Mackerel, Herring, Blue Whiting, etc.).
4. It is positive that the possibility for the fishermen to provide scientific advice is mentioned. EAPO has since long asked to work on the use of stakeholder data in the scientific assessments and looks forward to more widely accepted scientific data through implementation of this initiative.
5. For demersal fisheries it is disappointing to see that, when there is no scientific advice available, assessments will still be based on average catches. It has been established and pointed out several times that this is not a solid base and that this can be detrimental to the stocks and counter-productive for the ultimate goals of the Common Fisheries Policy.
6. It is also noted that a linkage between this Policy Statement and the Cod Recovery Review seems to be missing. EAPO has already indicated to have problems with the Commission's Recovery Review document and would have hoped to find a more clearly reference in the Policy Statement 2009.
7. A specific comment on section 10 in the Commission's document on Discards is that it does not take into account the new way of thinking about this issue, but only mentions the idea about fishing mortality. Accordingly in EAPO's view this section should be rewritten to reflect the new thinking.