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View on the European Commission's proposed Approach
to managing the Fishing Opportunities for 2011
[COM(2010)241]

1. As a member of ACFA, EAPO regrets that it has not been possible to consolidate an ACFA response to the above mentioned communication. Even for the individual members of ACFA the requirement to consult their own members could not be accommodated in the given time frame. Although the deadline is inadequate for a meaningful consultation, EAPO still wishes to present its view to the Commission, keeping ACFA apprised of the response.
2. With reference to the guiding principles it is noted that the proposals are based on STECF advice, in turn based on ICES advice. This would mean that only biological criteria are considered and that STECF will not take into account the socio-economic aspects. This is contradicting the statement further in the document that the development of the socio-economic analysis should be taken into account in the fishing opportunities communication.
3. EAPO confirms having no problem with the MSY concept. However, even ICES has not yet established that Fishing Mortality is to be the determining factor for MSY. Therefore EAPO finds that first ICES should be asked about F_{msy} . Specifically for mixed fisheries F_{msy} is not a practical criterion.
4. The changes to the working method targeting F_{msy} are therefore too drastic and could lead to a reduction in TAC threatening the survival of quite a few components of the industry.
5. Concerning pelagic fisheries, EAPO finds that it should have been pointed out that in some cases no agreement exists on LTMPs. This is causing a difficulty and therefore the European Commission should point out in the fishing opportunities communication who is causing the problem.
6. The communication mentions the European Commission's intention to organize a consultation on effort management in the Celtic Sea. EAPO does not support the contents of the non-paper that has been prepared on this subject. Active work is in process within EAPO to finalize an appropriate alternative.

7. EAPO welcomes the Commission's statement about stakeholders input and the introduction of fishermen's information into the data. However in the conclusion, the EC seems to be taking a step backwards on this when asking for an evidence based approach, which is difficult to organize.

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