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**OBSERVATIONS TO THE COMMISSION'S COMMUNICATION ON "FISHING
POSSIBILITIES FOR 2008. GENERAL POLICY STATEMENT FROM THE
EUROPEAN COMMISSION".**

CURRENT SITUATION

The EAPO shares the Commission's concern about carrying out an efficient management of resources and doing a conservation policy which is shared by the fishing industry.

Surprisingly, in the announcement of this Communication to the mass media, it is again asserted that "*near 80% of the European fisheries are overexploited*". In this sense, at the last meeting on the state of global stock, the FAO made it clear that the words "totally exploited" and "overexploited" shall not be misinterpreted. The FAO states that 52% of the resources are totally exploited while 25% are overexploited.

The EAPO calls for the public opinion not to be further confused and that the difference of meaning between "*totally exploited*" and "*overexploited*" is well reflected.

The EAPO considers that the assertion that the results obtained since the Reform of the CFP in 2002, show that "*stocks are not showing a tendency to recover or to increase inside safe biological limit*"¹, does not reflect the actual state of stocks in Community waters. If not, how can we understand that management measures for Northern Hake, the Golf of Gascogne sole, the North Sea haddock, saithe and mackerel have been successful? These species are mentioned by the Commission as good management examples. It says that only the recovery plan for cod has not reached the expected outcome².

Therefore, the EAPO does not share the pessimist picture of the Commission and insists that generalizations made by the Commission are not good. Each case should be analysed having in mind that behind each one there is an industry and thousand of families who live on fishing. Public opinion is too much sensitive to "bad news" on European fisheries. If things are not made clear enough and each fishery situation is not rigorously analysed, we run the risk of further blaming the European catching sector for all harms caused to marine environment.

¹ Point 2.5) of this Communication

² Point 2.2) of this Communication

The EAPO insists that there are many TACs which are not still a point for Scientific Report³ and the Commission is not providing practical solutions to have more human and financial resources available which allow to know more exactly and rigorously, the reproducing biomass and fishing mortality of a number of stocks-areas which continued to be analysed under the precautionary approach.

On the other hand, the Commission is not contributing with any solution either to analyse the impact of other factors and activities other than fishing, on the marine environment. Everybody knows that weather, climate changes, contamination, sand and oil extraction, etc. are aspects that affect ecosystems however human and financial means are not provided to better know the impact produced by these factors and activities.

The EAPO considers that efforts shall be intensified to get that knowledge and eliminate, as much as possible, the big uncertainty that currently exists.

THE FUTURE

The EAPO considers that no mathematic rule can be applied to fix TACs for 2008 and the following years. The fishing industry has always defend that in case of a resource facing problems, a maximum 15% annual reduction could be applied on TAC once social and economic effects from such reduction are analysed. However, this analysis requires a serious and rigorous study on a case-by-case basis and with the involvement of Scientifics, administration and industry. Things cannot be simplified so much when the survival of the catching sector is at stake on which thousand jobs depend and which is providing a health and nutritive product to the society.

SOLUTIONS

Once again, the EAPO considers that the best solution implies the sector's involvement through the establishment of experts groups made up of scientists, Commission's staff and industry. These groups would analyse, **as regards stocks deemed to be in bad situation**, new data input, new studies, surveys at sea, observers on board, temporary stoppages, closed areas, etc. This is the only way to accept and comply with those measures approved within those joint groups.

On the other hand, we shall facilitate the means to obtain more and better social and economic studies on each fishery. It is said that social and economic consequences shall be taken into account; however scientific studies on this issue are scarcely available which would provide arguments in favour of maintaining this sector.

Finally, the EAPO considers that the new CFP cannot be successful if we are not able to reinforce the fishing scientific research with more and better data which provides a less uncertain future for the sector.

José A. Suárez-Llanos
President

³ See EAPO's letter on "Observations on the latest ICES Scientific Report (October 2006)