



Minister Karen Ellemann

Minister for Fisheries and Equal Opportunities and Minister for Nordic
Cooperation

Denmark

flnminister@um.dk

Via e mail

7th March 2018

Dear Minister,

I write on behalf of the Low Impact Fishers of Europe Platform [LIFE], an organisation of organisations of small scale fishers across Europe, to highlight the current threats to the long term sustainability of fish stocks and those who rely upon them in the Baltic Sea region.

LIFE and its constituent member organisations represent specifically smaller scale commercial fishermen [80% of the EU fleet by number] who use passive fishing gears and fish in an infinitely less impactful way than do their large scale mobile gear counterparts.

LIFE writes to implore you to take both notice and action with regard to your specific legal responsibilities under the Common Fisheries Policy and related legislation to put an end to illegal and unreported discarding in the Baltic Sea by the Danish trawling fleet.

We are aware that individual member states, the European Commission and the members of the European Parliament have made a great deal of the need to eradicate Illegal, Unregulated and Unreported [IUU] fishing across the globe. However,

it is also shamefully clear that many member states are choosing at the same time to ignore what is visibly going on in respect to IUU in their own backyards. The implications of IUU are spelled out effectively by the FAO:

“IUU fishing undermines national and regional efforts to conserve and manage fish stocks and, as a consequence, inhibits progress towards achieving the goals

of long-term sustainability and responsibility as set forth in, *inter alia*, Chapter 17 of Agenda 21 and the **1995 FAO Code of Conduct for Responsible Fisheries**. Moreover, IUU fishing greatly disadvantages and discriminates against those fishers that act responsibly, honestly and in accordance with the terms of their fishing authorizations. This is a compelling reason why IUU fishing must be dealt with expeditiously and in a transparent manner. If IUU fishing is not curbed, and if IUU fishers target vulnerable stocks that are subject to strict management controls or moratoria, efforts to rebuild those stocks to healthy levels will not be achieved". [<http://www.fao.org/fishery/iuu-fishing/en>].

As you will be only too well aware from the European Fisheries Control Agency (EFCA) last haul analysis and ICES Working Group reports, the Baltic is a case in point.

Figures currently available illustrate the levels of discards in the Baltic. In 2015 and 2016, a total of over 30,000,000 cod were illegally discarded and despite all the apparent support for the Landings Obligation, the Baltic Multi Annual Management Plan and the fight against IUU, 90% of undersized Baltic cod taken by trawlers are still being discarded. This latter situation has of course been exacerbated by the highly questionable decision to reduce the MCRS for cod in the Baltic, something that has only encouraged a reduction in trawl selectivity and increased the commercial attraction for the pursuit and retention of juvenile and biologically undersized cod.

I write on behalf of LIFE as both an ex trawler skipper and fisheries manager. I can therefore see the issues from both sides. Whilst I would be the first to agree that fisheries science is a complex and challenging endeavor, at the same time, some of the basic biological requirements for a given fish stock are remarkably simple. Baltic cod, and indeed other species therein are good examples of the need and opportunity for some straightforward management solutions.

First and foremost among these is the need to effectively protect the current spawning population to ensure future fisheries. Our concern in this respect is that whilst we collectively have the massive potential future benefit of a buoyant year class, the rampant disregard for regulations, designed specifically to meet these requirements for the protection of the stock are being flouted in the most outrageous manner. This situation is of course not being helped, in fact quite the opposite, by the reduction of at - sea checks by your officers and others.

It is a plain fact that unless and until the member states bordering the Baltic act decisively and quickly to protect the present stocks from extensive IUU effort then it does not take a fisheries scientist to guess where the stock status will be, or not be in the coming years. It is urgent that the grievous lack of selectivity in trawls is directly addressed, along with the clear lack of will that is necessary but sorely lacking in the larger scale fleet to avoid the capture of juvenile fish in the first place.

In this regard, if an unselective method of fishing is unable to dramatically reduce its lack of selectivity, that in turn risks the destruction of future fishing opportunities for all sectors, with knock on effects to the wider environment, then allowing such a method to continue needs serious and urgent reconsideration.

As long as mobile gear operators are allowed to get away with such damaging activities and effectively given carte blanche to continue unchecked, then it can hardly come as a surprise that there is little incentive for them to reconfigure their fishing gear to avoid the by-catches in the first place. With the greatest of respect to fisheries regulators, turning a blind eye to the wholesale slaughter of future generations of fish for the short term economic benefit of a relatively few large scale operators is doing no more than condoning IUU.

The allocation of the vast majority of quota to fishing operations that do the most damage is a perverse policy, and only serves to strengthen resistance to the changes needed.

In this regard, there is a legal requirement for Member States to transparently and objectively apply Article 17 of the reformed Common Fisheries Policy that requires [not asks or suggests] that when allocating fishing opportunities, member states shall [my underlining] include social, economic and environmental criteria in their decision making processes.

So rather than continuing the status quo in terms of the allocation of quota, that already contravenes the CFP, rewards those who do the most damage not only to fish stocks but also to the wider marine environment and who at the same time provide the least socio economic benefits to often vulnerable coastal communities, it is well past time that Baltic member states take the initiative to gradually reallocate access to quota to the smaller scale, less impactful sector of the sector. This sector is ready, willing and able to utilize the opportunities therein to provide significant additional benefits derived from improved access to a public resource to local coastal communities and importantly, the wider public.

The fact that the changes we seek might produce a short term economic challenge for those who have long benefitted from the status quo is frankly irrelevant when considered alongside the massive longer term benefits that more effective fisheries management and quota reallocation would bring, socially, economically and environmentally. The fact that these changes would also protect a public resource for wider Society should not be forgotten.

In conclusion, we ask that you:

- Genuinely implement the requirements of Article 17 of the CFP
- Improve the monitoring and regulation of current fisheries activity with a focus on those responsible for the vast majority of illegal discards
- Act decisively with regard to the current access to fishing opportunities to those using unselective fishing gears

All three of the requests above are in fact legal requirements on member states under the Common Fisheries Policy.

LIFE and our members are here to support you in these efforts to deliver long term sustainable fish stocks and fisheries in the Baltic Sea. We would welcome the opportunity to discuss these matters with you at your convenience.

Yours sincerely,

Jeremy S Percy

Executive Director

Low Impact Fishers of Europe Limited.

W: www.lifeplatform.eu E: director@lifeplatform.eu

T: 0044 1437 751242 M: 0044 7799 698568

