

European Association of Fish Producers Organisations
Association Européenne des Organisations de Producteurs dans le secteur de la pêche



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To the Danish Chairmanship and members of the
Scheveningen Group
(Via e-mail to Ms. Lisbeth Nielsen – lisbni@um.dk)

=====URGENT=====

EAPO19-10

Oostende, 9 May 2019

Dear Madam, dear Sir,

Subject: *EAPO position on the Draft Joint Recommendations from the Scheveningen Group on amending the North Sea Discard Plan*

Industry representatives received a copy of the Scheveningen Regional Group draft Joint Recommendations for amending the Discard Plan for Demersal Fisheries in the North Sea via the NSAC secretariat. The European Association of Fish Producers Organisations (EAPO), with input from other industry representatives would like to share its views on the draft with the Scheveningen Group.

General Comments

EAPO wishes to re-emphasize that it is important to understand that the introduction of the Landing Obligation (LO) entails a major shift in the EU Common Fisheries Policy and thus involves a break with decades of painstakingly built-up rules and fishing practices. Such a shift inevitably takes time and therefore EAPO re-iterates its request that all parties having an interest, focus on the objectives and show patience in respect of the strict implementation of a tool to reach those objectives.

EAPO and other industry representatives have repeatedly called upon the EU Commission and other authorities to take a constructive approach towards the LO and focus on the objective rather than the tool. As such, making the effort and taking the time to teach and guide the fishing industry about the LO, in our view has a much greater chance to successfully achieve avoidance of unwanted catches and enhanced data collection. At present there is little acknowledgement in the industry that the LO will contribute to increased sustainability in fisheries.

Regarding the 2020 discard plan, the fishing industry emphasises the need for a clear and straightforward formulation of the rules. At times it is very complicated for both fishermen and inspectors to understand what is allowed and what is illegal. Consequently, we would recommend that the authorities provide a straightforward overview on what can be discarded and the way it has to be reported.

It should be clear to fishermen how to handle inevitable by-catches and unwanted catches without running into fisheries control problems. In that respect EAPO also considers it useful to consider applying de-minimis exemptions for certain species in one area, also in other waters. Consequently, the fishing sector considers it a positive development that the draft contains a proposal to have the current winter survival exemption for plaice, caught in trawls with a minimum mesh size of 120 mm, in force all year round.

EAPO appreciates the work done to ensure that the exception for plaice will apply to other fisheries where there is high survival. It is certain that all fish that are landed, will die. Consequently, the industry strives for the implementation of a general exception from the LO for plaice caught in trawls. Likewise, it would be advisable to introduce an exemption from the LO for inevitable by-catches of industrial species in demersal fishing. A LO for inevitable by-catches in no way contributes to sustainable management. As previously stated, it is important for fishermen to be able to handle both unavoidable by-catches and unwanted catches without running into fisheries control problems.

Overall the draft dated April 12th, as provided to the stakeholders the subsequent week, led to many industry representatives' comments that it is a comprehensive document taking into account quite a few concerns currently existing in the North Sea fisheries. In other words, the industry representation largely supports the document. However, generally there was also the

comment that the strict deadlines are hampering useful input by stakeholders. More time for consideration could lead to a much higher acceptance and understanding.

Specific Comments

Section 4.1.2: It is suggested to add a clarification on how the catches should be registered when fishing in the Norwegian zone.

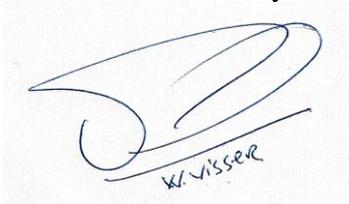
Section 4.2.5: It should be generally clarified why special regulations are required for this Cuckoo Ray. Its main distribution is in more southerly areas and the IUCN-classification is “least concern”.

Section 4.3.1/2: The industry representation fully supports these exemptions, but ask to consider if there will be any additional sampling program for monitoring.

Section 4.3.5: The industry representation fully supports this, as it helps to prevent management of single individuals of widely spread species if they appear in very low numbers as bycatch. Such an exemption will have no impact on stocks/management of these species.

Please do not hesitate to contact us should an more ample explanation be required. Thanking you to taking our positive view into consideration, we remain,

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'P. Visser', with a stylized flourish above it.

Pim Visser,
President