



**European Association of Fish Producers Organisations (EAPO)
(Northern Pelagic Working Group – NPWG)**

To:

- Commissioner Mr Karmenu Vella (MARE)
- Commissioner Mme Cecilia Malmström (TRADE)

Subject: request for a trade sanction measure against Iceland

Date: 28th of July, 2019

Dear Mr Vella, dear Mme Malmström,

Since almost a decade now the situation of the North-East Atlantic mackerel stock – the most valuable pelagic fish stock in the North East Atlantic – is a matter of great concern to the EU pelagic fishing industry. Our concern focuses on the ever-continuing absence of effective joint management of this stock by all countries that have a stake in this valuable fishery. More precisely, the EU, Norway and the Faroe Islands have agreed in 2014 on a three-party management and sharing arrangement, but until now it has proven impossible to have Iceland, Russia and Greenland joining this management and sharing agreement. The consequence of this situation is that every year the three non-party countries set unilaterally their own mackerel quota at a higher level than the share that has been set aside for them by the EU, Norway and the Faroe Islands. The result of this is that the overall catches are continuously higher than the agreed TAC (Total Allowable Catch). This will eventually have a negative impact on the health of the mackerel stock with the detrimental consequences for the EU pelagic value chain.

The reason for us to direct ourselves to you by this letter and at this point in time lies in the fact that Iceland this month has unilaterally decided for a 30% in-year increase of their mackerel quota after the relevant scientific advisory body (ICES) advised for a possible increase with maximum 18% and after the EU, Norway and the Faroe Islands had decided not to increase their quota following the ICES advice.

As EU pelagic industry we feel very strongly that the time has now come to act towards Iceland. For almost a decade now Iceland is setting a unilateral mackerel quota on an annual basis and at levels that have no basis in the scientific advice. Moreover, Iceland is consistently refusing to really engage itself in Coastal States discussions with the aim to find a balanced outcome. Despite the offers that have been laid on the table by the other coastal states: EU, Norway and the Faroe Islands. The in-year increase of Iceland's 2019 mackerel quota with 30%

is a clear signal and proof that Iceland is not willing to come to a management and sharing agreement on mackerel with the other coastal states.

We therefore have arrived at the moment that the EU has to give a clear signal to Iceland against their irresponsible behaviour by allowing non-sustainable fishing and by failing to cooperate with the EU in the management of the North East Atlantic mackerel stock without giving due regard to the rights and interests of the others, including the EU. Such a clear signal must in our view be in the form of a proposal by the European Commission to the Council and the European Parliament for a trade sanction measure aimed at all seafood exports from Iceland to the EU. We refer in this respect to the discussions between the EU institutions in 2011, 2012 and 2013 resulting in a trade sanction measure against the Faroe Islands.

Due to the fact that the framework legislation for trade sanctions against countries that allow non-sustainable fishing is already in place, the EU fishing industry requests kindly but strongly a quick action from the European Commission to come forward with a concrete trade sanction proposal towards Iceland.

We are of course at your disposal to further discuss our letter.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Gerard van Balsfoort', with a large, stylized initial 'G' and a long horizontal stroke extending to the right.

Gerard van Balsfoort
(chair Northern Pelagic Working Group)

c.c. PermReps of Belgium, Denmark, France, Germany, Ireland, the Netherlands, Poland, Spain, Sweden, United Kingdom,