

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



**EAPO / AEOP**

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**Letter by e-mail attachment to:**

COMMISSIONER Virginijus Sinkevičius ([cab-sinkevicius-contact@ec.europa.eu](mailto:cab-sinkevicius-contact@ec.europa.eu))

CC: - Vice-president Timmermans ([frans-timmermans-contact@ec.europa.eu](mailto:frans-timmermans-contact@ec.europa.eu))  
- DG Envi ([Daniel.Calleja-Crespo@ec.europa.eu](mailto:Daniel.Calleja-Crespo@ec.europa.eu))  
- DG Mare ([Charlina.Vitcheva@ec.europa.eu](mailto:Charlina.Vitcheva@ec.europa.eu))

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Dear Commissioner Sinkevičius,

**Subject: EAPO position on the Biodiversity Strategy**

The EU Biodiversity Strategy for 2030 has been published by the Commission on the 20<sup>th</sup> May 2020<sup>1</sup>. EAPO welcomes the goal to increase resilience to threats such as climate change impacts, food insecurity, and disease outbreak. However, the fishing sector is clearly opposed to the way the Strategy approaches these issues in terms of fisheries. The Strategy paints the fisheries sector in a very negative way ignoring the fact that European fisheries operate in fully regulated environment that has sustainability at its core. In addition, the Strategy fails to recognise that EU fisheries already significantly contribute to limiting the environmental impact of the EU and is committed to continue to do so in future years. An example can be found in the recent report of STECF showing the huge improvements over the past years in terms of stock biomass (50% more fish in the sea in the NE Atlantic in the last 10 years) and fishing pressure (all EU managed NE Atlantic stocks at or under  $F_{MSY}$  in 2018)<sup>2</sup>.

Policies and Strategies can only work when all stakeholders are involved and when they contain workable actions to reach the objectives. Such actions need to be implementable and require a balanced approach of the ecological, economic, and social pillars of sustainability. Furthermore,

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<sup>1</sup>EU Biodiversity Strategy for 2030, Bringing nature back into our lives, [https://ec.europa.eu/info/sites/info/files/communication-annex-eu-biodiversity-strategy-2030\\_en.pdf](https://ec.europa.eu/info/sites/info/files/communication-annex-eu-biodiversity-strategy-2030_en.pdf)

<sup>2</sup> Monitoring the performance of the Common Fisheries Policy (STECF-Adhoc-20-01) <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC120481/ki-ax-20-002-en-n.pdf>

workability of the actions should be assessed against an impact analysis based on realistic key performance indicators.

While the Strategy advocates for a surge of the surface of protected areas to 30% (including 10% no take zones) without distinction between land and seas, EAPO would like to point at the differences that exist between oceans and land-based ecosystems.

For marine protected areas (MPAs), this figure represents a significant increase of 20%. This is not a sensible approach in view of the fact that biodiversity is already considered in all European seas under the Common Fisheries Policy (CFP) ecosystem-based approach. The latest figures on fish stocks show that the fishing sector has done huge efforts in the past years to reduce its impact and increase the resilience of the marine ecosystems. It is also a clear evidence, backed by science<sup>3</sup>, that management in the EU is working and that there is no factual basis for fencing off a third of the EU's oceans. Area based conservation measures should be taken in cooperation with the fishing industry, ensuring co-construction of projects and benefit flows to be unlocked for both the environment and coastal fishing communities. Setting up non-factual and sound bite figures is not the solution and will not have the desired effect on the ground.

A new action plan is to be proposed by 2021 and points at bottom-contacting gears. Those gears are already regulated through the CFP technical measures that set strict specification for gear uses (design, mesh sizes, by-catches rates, forbidden areas, etc). The introduction of the landing obligation also meant that huge efforts were undertaken to increase selectivity of these gears<sup>4</sup>. In addition, gears that have contact with the bottom are widely used in the EU and are the only gears available for fishing a large number of species.

EAPO is therefore opposed to this plan. Such an approach risks jeopardising a major part of the fishing sector while not contributing significantly to the Strategy's goals. Further support of the work on selectivity and bottom impact have to be supported without ruling out much needed fishing techniques.

In the oceans, one of the greatest threats to biodiversity is climate change<sup>5</sup>. The fishing sector would like to highlight that the precise CFP requirements, the annual evaluations by the STECF and other international scientific bodies such as ICES, are not something common to other industry sectors. When on the one hand fishing gears catch a set amount of fish from a limited number of species, on the other hand acidification, invasive species and temperature changes affect all life in the ocean.

EAPO therefore does not understand why fisheries is highlighted as the main problem and does not accept the biased treatment by the Commission. EAPO is of the firm view that these accusations are not based on fact and are groundless. Fishermen already are victims of climate change impact while they provide sustainable food to the EU consumers with the lowest carbon footprint of all animal products<sup>6</sup>, and with almost no land and water use. Seafood products should be promoted as such and the sector should be encouraged not denigrated.

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<sup>3</sup> Hilborn, Ray, Ricardo Oscar Amoroso, Christopher M. Anderson, Julia K. Baum, Trevor A. Branch, Christopher Costello, Carryn L. de Moor, et al. 2020. 'Effective Fisheries Management Instrumental in Improving Fish Stock Status'. Proceedings of the National Academy of Sciences 117 (4): 2218. <https://doi.org/10.1073/pnas.1909726116>.

<sup>4</sup> [https://ec.europa.eu/fisheries/cfp/fishing\\_rules/landing-obligation-in-practice\\_en](https://ec.europa.eu/fisheries/cfp/fishing_rules/landing-obligation-in-practice_en)

<sup>5</sup> IPCC SPECIAL REPORT: SPECIAL REPORT ON THE OCEAN AND CRYOSPHERE IN A CHANGING CLIMATE, Summary for Policymakers "A.5.4 In many regions, declines in the abundance of fish and shellfish stocks due to direct and indirect effects of global warming and biogeochemical changes have already contributed to reduced fisheries catches (high confidence)", p12, [https://www.ipcc.ch/site/assets/uploads/sites/3/2019/11/03\\_SROCC\\_SPM\\_FINAL.pdf](https://www.ipcc.ch/site/assets/uploads/sites/3/2019/11/03_SROCC_SPM_FINAL.pdf)

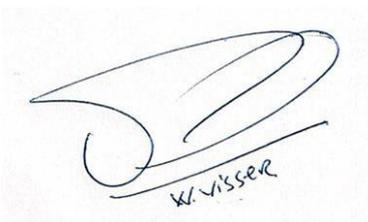
<sup>6</sup> 'Protein Scorecard'. 2016. World Resources Institute (blog). April 2016. <https://www.wri.org/resources/data-visualizations/protein-scorecard>.

As the COVID-19 crisis has made clear, it is of paramount importance to provide citizens with healthy sustainable local food. The impact of the crisis on supply chains shows the value of local producers and therefore our coastal communities should be supported. The fishermen represented by EAPO are mainly working in small to medium size family owned businesses that allow for economic activity to take place in some more remote areas across the Union. Meanwhile, the environmental benefits<sup>7</sup> of a diet based on seafood products is complemented with its health benefits. Access to healthy sustainable food has proven to be key during the pandemic as well as in regular time.

EAPO therefore questions the way the coronavirus outbreak is used to justify ever more stringent measures on fisheries, overlooking the sustainability aspects, low carbon footprint, health and environmental benefits and the food security elements. Instead of denigrating the sector the Strategy should be promoting the virtues of the Fisheries Sector as custodians of the Marine environment, economical drivers of local communities, and producers of healthy and sustainable local food.

In conclusion, the fisheries sector, as provider of sustainable, qualitative, and healthy food, is under huge pressure as spatial competition increases with new offshore activities in energy, aggregate extraction, transport, etc. The economic difficulties faced during the COVID-19 crisis, in addition to the looming perspective of Brexit mean that the sector needs and deserves support. The EU fisheries are a huge opportunity for society to benefit from sustainable, local nutritious food that will allow the EU to lead in the protection of the marine environment and the building up of a more resilient society. EAPO calls on the Commission to re-consider the one-sided Strategy and make it fit for purpose.

Yours sincerely,

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

Pim Visser,

President

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<sup>7</sup> Gephart, Jessica A., Kyle F. Davis, Kyle A. Emery, Allison M. Leach, James N. Galloway, and Michael L. Pace. 2016. 'The Environmental Cost of Subsistence: Optimizing Diets to Minimize Footprints'. *Science of The Total Environment* 553 (May): 120–27. <https://doi.org/10.1016/j.scitotenv.2016.02.050>.