

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



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EAPO feedback on the evaluation of the Deep-sea Access Regulation

General remarks

The deep-sea area benefits from a special regulation that contains strict provisions to ensure a sustainable fishing and the increase of scientific knowledge. This is because certain marine ecosystems are particularly vulnerable to human activities. Fishing in the deep-sea is extremely regulated and abides by rules that are amongst the strictest in the world.

The current regulation (2016/2336) is still hard to assess as provisions have been in place only for a couple of years now and some implementing acts are still awaited. The direct effect of the regulation has been clear with a net decrease of deep-sea species catches. The ban to fish below 800m also meant in effect an end of targeted deep-sea fisheries. No displacement of effort to the 600-800m deep zone has been observed as the main deep-sea fleet switched to target the regular bottom-trawl species.

According to EAPO, the current regulation seems to work on this point and no important change is needed. It is the result of long trilogue negotiations, and it is now hard to reopen a debate that was tainted by media over-coverage and dogmas.

However, EAPO would like to remind that the 800m limit set in this regulation is arbitrary and is more restrictive than the internationally agreed one. This effectively hinders an important aim of the regulation which is to gather knowledge by limiting information gathering and our scientific understanding of these species. Finally, EAPO considers that not all the species in the list of the regulation's Annex I can be viewed as "deep sea" ones.

Specific Article remarks

- Article 5 on fishing authorisations

This article is considered relevant and reached its goal. The targeting fishing authorisation and by-catch fishing authorisation fulfil their role. The threshold adopted are also relevant.

- Article 7 on existing deep-sea fishing areas

It is yet unclear to EAPO how and to whom this measure will apply. The approach should follow the one applied to EU and international fleets and take into account the activities of ships in the zones regardless of their flag.

- Article 9 on Specific requirements for the protection of VMEs

This article's goes further than the remit of "deep-sea" and might impact other fisheries. The protection of VMEs is extremely important, the implementation of this article will also need to be vigilant on the size of the zones to avoid (buffer) in order to not impeach regular fisheries operations.

On those two last articles it is important that the Commission works with stakeholders when developing the implementing acts in 2021. The advisory councils will also need to be consulted.

Concluding remarks:

The current deep-sea regulation seems generally relevant to EAP. The authorisation system is efficient and the VMEs protection is effective. Scientific knowledge needs to be developed on those ecosystems and fishermen are already working closely together with scientists in order to gain a better insight into the deep-sea ecosystems and the dynamics of the deep-sea populations. The regulation should continue to ensure as much as possible the sustainable exploitation of deep-sea stocks while reducing the environmental impact of these fisheries, and to improve the information base for scientific assessments.