

**European Association of Fish Producers Organisations**

**Association Européenne des Organisations de Producteurs dans le secteur de la pêche**



**EAPO / AEOP**

**H. Baelskaai 20 – 8400 OOSTENDE (Belgium)**

**Tel: +32 59 43 20 05**

**e-mail: [info@eapo.com](mailto:info@eapo.com)**

**website: [www.eapo.com](http://www.eapo.com)**

---

**To: Ms. Charlina Vitcheva**

**DG Maritime Affairs & Fisheries**

**European Commission**

**(by e-mail)**

**EAPO22-37**

Oostende, 27 June 2022

Dear Ms. Vitcheva,

**Subject: EAPO Position Paper on deep sea fishing VMEs**

EAPO took note of the possible implementation of almost 100 new fishing restriction zones due to the presence of Vulnerable Marine Ecosystems (VMEs) between 400m and 800m deep along the coast of Spain, France, and Ireland.

This implementation follows the Deep-sea access regulation published in 2016 where ICES input was needed to list the locations where VMEs are occurring or are likely to occur. The list of locations, as well as 4 scenarios were published on the 5th of January 2021.

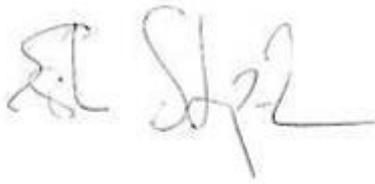
EAPO wishes to express the need for the Commission to consult stakeholders on this issue, even if the list of locations cannot be challenged, but the choice of the scenario and the implementation process should be by mutual agreement.

The fishing fleet affected by these restriction zones are the ones facing many issues due to the recent crisis. These fleets suffer increased operational costs during the current commodity and energy price crisis, whilst at the same time meeting low fish prices due to the increasing inflation rates. Also, these restrictions come in addition to the increasing pressure fishing businesses are submitted to regarding maritime space: MPAs, Offshore Wind Farms, Brexit...

The lack of concertation and preparation will lead to fishing vessels moving towards other fishing zones, and to a potential disruption of markets due to this forced displacement. EAPO regrets to note that the environmental regulations set for fishing activities are much higher than the ones needed for deep sea mining, an activity much more impactful on the ocean seabed.

EAPO is aware of the exchanges on this subject between the Commission and EBFA and was of a meeting scheduled today. We hope to organise EAPO attendance of this meeting on a short notice in order to ensure that our position is covered.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Esben Sverdrup-Jensen', written in a cursive style.

Esben Sverdrup-Jensen

President