

24 August 2016

To: Ministers of EU Member States  
The Fisheries Attachés of the EU Member States

**Re: Technical Measures Framework**

Dear Minister,

On behalf of the Fisheries Secretariat and Seas At Risk we send you our recommendations for the ongoing Council deliberations on the Commission proposal for the Technical Measures Framework (TMF) (COM(2016) 134).

As part of the implementation of the Basic Regulation of the Common Fisheries Policy, many regulations concerning technical measures are outdated. The framework proposal from the Commission aims to decentralise and simplify these measures while ensuring a baseline standard across the EU that ensures stocks are healthy and minimises the effects of fishing on the ecosystem.

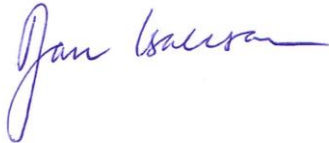
Technical measures define where, when and how fishing can be undertaken and are the main way we can regulate the impact of fishing on stocks and the wider marine ecosystem. We believe that regionalising these regulations is a valuable step toward implementing the ecosystem-based approach to fisheries management, which takes into account the complexities of individual fisheries and seas.

Regarding your discussions, we ask you to consider the following joint NGO priorities:

- The landing obligation implementation has yet to be a success. In the Baltic, ICES estimates that one quarter of eastern Baltic cod was illegally discarded last year. The TMF must help to address this and other situations through improvements in avoiding unwanted catches. Some of the most crucial technical measures include real time closures and closed areas, protection of juveniles through minimum conservation reference sizes, and selectivity improvements.
- The protection of sensitive species and habitats requires clear targets, obligations and appropriate measures to reduce impacts of fisheries throughout the EU, which can then be strengthened regionally in specific cases; the proposal is weak in this area. Also it does not explicitly cover all relevant species, and only refers to closed areas as a measure to protect habitats, ignoring possible additional measures including gear restrictions or mitigation measures. However, there has been a positive step toward aligning technical measures with the objectives of the Marine Strategy Framework Directive, the Birds and Habitats Directives and the EU 2020 Biodiversity Strategy.

In addition to **the recommendations above that are further elaborated in the attached Annex**, FishSec and SAR recommend the inclusion in the TMF of additional spatial planning measures to provide managers with effective tools, including zones permanently designated for certain fisheries. Smart designated trawling areas for example could allow for simplified trawling regulation, reduce clashes with passive gear fisheries or other maritime activities, and limit environmental impacts to certain zones.

Yours sincerely,



Jan Isakson  
Director  
Fisheries Secretariat (FishSec)



Monica Verbeek, PhD  
Executive Director  
Seas At Risk (SAR)