



Minister Karen Ellemann
Minister for Fisheries and Equal Opportunities and Minister for Nordic Cooperation
Denmark
Via email: flnminister@um.dk

21 February 2018

Re: Ending illegal, unreported discarding of fish by the Danish fishing industry

Dear Minister Ellemann,

We are writing to you to express our concern regarding the illegal and unreported discarding being carried out in the Baltic Sea by the Danish fishing fleet, as recently documented by scientists and NGOs, and reported by DR^{1,2}. We appreciate your acknowledgement of the problem, and we urge you to implement the solutions needed to reduce wasteful and illegal discarding, including significantly increasing at-sea monitoring and control.

Discarding of fish not only wastes resources, it increases fishery costs, threatens endangered species, and impacts our food webs. The growing awareness of these threats to Europe's oceans led to almost 900,000 people supporting a ban on discards during the reform of the Common Fisheries Policy, and motivated the European Parliament and the EU Council to legislate the Landing Obligation in 2013, in order to eliminate discards and drive change in fishing practices.

The failure to properly enforce the discard ban in the Baltic Sea not only jeopardises the sustainability of fish stocks and undermines scientific advice, it introduces illegal activity into our fisheries. This must change: it is not acceptable for the fishing industry to continue to indulge in blatant law breaking, threatening the future of both our fisheries and those that depend on it for their livelihoods.

¹ <https://www.dr.dk/nyheder/penge/forskere-fiskere-smider-ulovligt-1300-ton-torsk-ud>

² Our Fish, 2017, Thrown Away: How illegal discarding in the Baltic Sea is failing EU fisheries and citizens.
<http://our.fish/en/2017/11/13/thrown-away-how-illegal-discarding-in-the-baltic-sea-is-failing-eu-fisheries-and-citizens/>

Scientists and experts from countries with effective discard bans have recommended that EU member states substantially increase at-sea monitoring and control to ensure compliance of their fleet³. However, following the Landing Obligation coming into force in the Baltic Sea, Denmark actually decreased at-sea inspections from 2015 to 2016 by ten per cent⁴. Although widespread non-compliance with the landing obligation in the Baltic Sea is known by fisheries managers and control officers, just two fines were given for discarding in three years, demonstrating the inadequacy and dysfunctional nature of the current control system.

Demersal trawlers and seines were responsible for 97% of discards of Eastern Baltic cod in 2016⁵, yet commercial adoption of selective gears has been slow. Denmark's trawl industry has had three years to adapt to the introduction of the Landing Obligation in the Baltic Sea; the ongoing discarding equates to nothing less than wilful, illegal, unreported activity, and can no longer be brushed aside with excuses.

The EU Control Regulation is currently under review and provides an opportunity to introduce the compulsory use of Remote Electronic Monitoring in the entire EU fleet, ensuring a fair playing field and improving compliance with the law.

Denmark has been a leading developer of remote electronic monitoring (fully documented fisheries) projects in the past, and improvements in technology, decreases in costs, and its adoption by governments in other parts of the world means implementation is not only achievable, but likely to be more efficient and effective than current monitoring systems⁶. It also enables vessels to demonstrate they are operating in accordance with best practice and improves data collection to support stock assessment and management decisions.

Now, we believe the Danish government has an obligation and the opportunity to take the lead on ensuring that EU fisheries rules are respected by all stakeholders. We are confident that as the new Minister of Fisheries in Denmark you can drive better practices within our fisheries, and be an example for other European nations.

We urge you to act now, so that Denmark can:

- 1) Ensure undersized fish are not caught in the first place, by requiring the use of more selective gear types;
- 2) Implement proven, cost-effective monitoring onboard all vessels above 10m length and in segments with an increased risk of discarding (EFCA classification) in the Danish fishing fleet, e.g through the installation of Remote Electronic Monitoring (REM) and closed-circuit video surveillance;
- 3) Increase inspections and control at sea; and

³ Agreed record of fisheries consultations between Norway and the European Union for 2018.

<https://ec.europa.eu/fisheries/sites/fisheries/files/2018-agreed-record-eu-norway-north-sea-12-2017.pdf>

⁴ Danish Agrifish Agency, 2016, Annual report on inspection of commercial and recreational fisheries 2016, Ministry of Environment and Food in Denmark.

⁵ ICES, 2017. Report of the Baltic Fisheries Assessment Working Group (WGBFAS). ICES CM 2017/ACOM:11.

⁶ WWF, 2017, Remote Electronic Monitoring: Why camera technology is a cost-effective and robust solution to improving UK fisheries management. https://www.wwf.org.uk/sites/default/files/2017-10/Remote%20Electronic%20Monitoring%20in%20UK%20Fisheries%20Management_WWF.pdf

- 4) Begin re-allocating quota to those in the fishing industry who have minimal impact, such as small-scale passive-gear fishers, and are complying with the law.

We would welcome an opportunity to discuss these issues with you in further detail. To arrange a meeting, please contact Rebecca@our.fish

Yours sincerely,

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