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European Commission
B – 1049 Brussels

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Commission Communication on the state of play of the Common Fisheries Policy and Commission proposals on fishing opportunities for 2020

Dear Mr. Aguiar Machado,

This year's Commission Communication on the state of play of the Common Fisheries Policy (CFP), and the subsequent proposals for Total Allowable Catches (TACs) in 2020, are decisive steps in delivering the commitments made in 2013 when the European Parliament, the Council and the Commission agreed a new CFP. This is the last opportunity to meet the 2020 legal deadline to end overfishing.

We welcome the Commission's stated ambitions to deliver on the CFP's requirements regarding sustainable fisheries. We also note the progress that has been made in the last decade to bring fishing mortality levels closer to scientifically advised levels, and the Commission's public statements on the progress made in recent Council meetings.

We remain concerned, however, that progress made to date is insufficient to meet the requirements of the CFP. According to the 2018 report from the Scientific, Technical and Economic Committee for Fisheries (STECF), "many stocks remain overfished and/or outside safe biological limits, and [...] progress achieved until 2016 seems too slow to ensure that all stocks will be rebuilt and managed according to F_{MSY} by 2020."¹ Our own analysis of the decisions demonstrates that, only one year before the 2020 deadline, more than 40% of TACs are still set higher than scientific advice. Although the Commission reports positive progress in terms of a growing list of TACs "in line with maximum sustainable yield", or a large proportion of landings in terms of tonnage meeting this criterion, progress toward the 2020 deadline to end overfishing of all harvested stocks is too slow, particularly for stocks for which scientific advice is currently still based on the ICES precautionary approach and/or which are primarily taken as bycatch.

The Commission has a crucial role in laying the groundwork for next year's fishing limits. The Commission's proposals for fishing opportunities are seen by Council as the baseline, with ministers rarely agreeing to

¹ Monitoring the performance of the Common Fisheries Policy

https://stecf.jrc.ec.europa.eu/reports/cfp-monitoring/-/asset_publisher/oz5O/document/id/2092147?inheritRedirect=false&redirect=https%3A%2F%2Fstecf.jrc.ec.europa.eu%3A443%2Freports%2Fcfp-monitoring%3Fp_p_id%3D101_INSTANCE_oz5O%26p_p_lifecycle%3D0%26p_p_state%3Dnormal%26p_p_mode%3Dview%26p_p_col_id%3Dcolumn-2%26p_p_col_pos%3D1%26p_p_col_count%3D2

set fishing limits lower than the Commission's proposals, and often seeking TACs that are much higher than scientifically advised levels. While the Commission's ambition to propose TACs in line with MSY-based advice is clear, its proposal has in the past frequently exceeded precautionary scientific advice, and the TACs agreed by Council then often exceeded the proposal.

It is therefore crucial that the Commission's proposals for 2020 do not exceed scientific advice for any stock, in order to meet the CFP's requirements. This will be particularly important as the Council adopts, for the first time, "effort quotas" under the Western Mediterranean demersal multi-annual plan. The Commission has a responsibility to send a strong signal that fisheries management in the Mediterranean – the most overfished sea – should now follow scientific advice.

Our organisations will support the Commission in reminding ministers of their responsibilities under the CFP, and progress will be more likely with proposals by the Commission that do not exceed the scientific advice.

Several international agreements require urgent progress toward fisheries sustainability, and the CFP built in a lengthy lead-in period to allow the EU to meet its 2020 deadline, after a reform in 2013 that was backed by unprecedented public support. Implementing the CFP's key sustainability requirement requires the same level of commitment and urgency from EU decision makers as was demonstrated during the reform. Delivering on this promise is also the most practical, achievable action that we can take with immediate effect to mitigate the wider threats faced by marine ecosystems; for example, the impacts of climate change, habitat degradation, and biodiversity loss. Marine ecosystems and fisheries face a multitude of threats, all of which are only exacerbated by overfishing.

We look to the Commission to ensure that these commitments are upheld, and to publish data that clearly and comprehensively document the progress made against the CFP's objectives. We would welcome the opportunity to meet with you to discuss how we can assist you in these endeavours in advance of the publication of the Commission's Communication this summer.

Yours sincerely,

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