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FISHSEC
THE FISHERIES SECRETARIAT

The Nature
Conservancy 

OCEANA

 **Our Fish**

 **SCIAENA**

 **SEAS AT RISK**

 Swedish Society
for Nature Conservation



Mr. Peter Kullgren
Minister for Rural Affairs

18 January 2023

Subject: Urgent request to the Swedish Presidency of the Council of the EU to conclude an ambitious agreement on the EU's fisheries control system.

Dear Minister Kullgren,

In view of your leading role within the Swedish Presidency of the Council of the European Union (Swedish Presidency), the Coalition of NGOs working on fisheries control¹ would like to draw your attention to the ongoing trilogue negotiations on the revision of the EU fisheries control system (the Control Regulation). This legislation is vital to achieving the objectives of the EU Common Fisheries Policy and associated European Green Deal and biodiversity strategy objectives.

After more than a year of trilogue discussions, we welcome the progress made by previous Presidencies on this crucial file. **We now respectfully call on you to mark your Presidency by concluding an ambitious agreement that future-proofs the EU's fisheries control regulatory framework, without any backtracking or weakening of current control rules.**

We call on the Swedish Presidency to conclude an agreement to:

1) Ensure that all quantities of each fish species caught are recorded, without expanding the margin of error allowed (the margin of tolerance) when fishing operators estimate their catches. Sustainable fishing is only possible if both scientists and policy makers have access to accurate and complete fisheries catch data. As dozens of scientists have affirmed, it is [impossible](#) to set quotas at sustainable levels and assess the health of fish stocks if the catch data are either unknown or poorly recorded. As the [example from the Baltic Sea](#) shows, a 10% margin of error in reporting the total volume of catches – instead of per fish species – has likely facilitated extensive misreporting and overfishing of certain fish stocks. Yet, in spite of the clear failure of such a *total catch* based margin of tolerance, some Member States have proposed to replicate a comparable rule in the future Control Regulation; namely allowing (temporarily) interchangeable reporting of certain tropical tuna species. Not only would this endanger an already critically overfished species (yellowfin tuna in the Indian Ocean); it would also be [very questionable under both international and EU law](#). Moreover, expanding the margin of tolerance as proposed by the Council would

¹ ClientEarth, Environmental Justice Foundation, The Fisheries Secretariat, The Nature Conservancy, Oceana, Our Fish, Sciaena, Seas at Risk, Swedish Society for Nature Conservation and WWF

severely undermine the EU's international credibility when promoting sustainable fisheries management and its zero-tolerance toward Illegal, Unreported and Unregulated fishing. **We thus urge you to find a compromise that is legal, promotes sustainable fishing and is able to guarantee the accuracy of catch reporting by EU fleets.**

- 2) Ensure full digital traceability of all fish and seafood products entering the EU supply chain without exemptions, including processed and preserved products.** The EU imports more than 60% of the seafood it consumes. As [requested by the EU's leading retailers](#), it is key to establish robust digital traceability to underpin the sustainability of fisheries products and prevent illegally-fished products from entering the EU market. Transparency on all seafood products is necessary to ensure a level playing field between EU and non-EU fishers, secure accountability within the supply chain, and benefit EU consumers, seafood companies and the environment.
- 3) Extend mandatory vessel tracking systems for all fishing vessels.** Vessel tracking devices are needed to monitor vessel fishing operations, manage fisheries sustainably, protect fishers by keeping them informed on important weather conditions, and help fishers declare their catch instantly via electronic logbooks. While current negotiations are focusing on exempting certain smaller vessels from this obligation, this system should be installed on all vessels. Current tracking systems are devised to be hand-held and to benefit fishers operating on smaller vessels. They are specifically designed to be practical, easily transportable, waterproof, and discrete. Tracking systems have already been successfully installed on board small-scale fishing fleets, with broad benefits and without any increased burden for fishers across several EU regions, including [in Malta](#) and Andalusia.
- 4) Make the installation of remote electronic monitoring (REM) systems – in particular CCTV cameras – mandatory** on all fishing vessels over 12 metres in length and on those under 12 metres that are deemed either at risk of breaching the rules of the Regulation or likely to be complicit in the bycatch of sensitive species. This will allow authorities to prevent discarding (when the fish is thrown back into the sea, an illegal activity under EU law), provide data on what has been caught, and allow better monitoring of unwanted catches of endangered, threatened or protected species.

The ongoing trilogue negotiations provide the opportunity to establish the EU's fisheries control framework for years to come. It must therefore ensure that EU fisheries will be properly and sustainably managed with the aim of minimising environmental impacts of fishing activities, ensuring food security, and creating climate-resilient and healthy marine ecosystems.

We, the undersigned civil society organisations, thus respectfully urge the Swedish Presidency to take this opportunity to future-proof the revised Control Regulation so that the EU modernises its fisheries control system, leads in sustainable fisheries management globally, and protects our ocean and climate.

We would very much welcome the opportunity to meet with your team ahead of the next trilogue to elaborate on our recommendations further. We remain at your disposal if you require any additional information.

Sincerely,

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