

SECTORAL SOCIAL DIALOGUE COMMITTEE ON SEA FISHERIES (SSDCSF)

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Brussels, 26 September 2013

Joint position of the European Social Partners of the fisheries sector¹ on the Regulation establishing specific conditions to fishing for deep-sea stocks in the North-East Atlantic and provisions for fishing in international waters of the North-East Atlantic COM(2012) 371 final

Background

The present proposal establishes a framework Regulation for exercising fishing activity targeting deep-sea species in the North-East Atlantic, comprising Union waters including outermost regions of Spain and Portugal, and international waters.

Social Partners agree with the European Commission that the general objective of the proposal must be to ensure the sustainable exploitation of deep-sea stocks while reducing the environmental impact of these fisheries, and to improve the information which is the basis for scientific assessments. However, in order to reduce the impact on the marine ecosystem, the EU Commission proposes that the use of bottom trawls and gillnets should be phased out in this fishery, as they are considered to be harmful to vulnerable marine ecosystems and have shown high levels of undesired catch of deep-sea species.

Social partners reject the Commission's proposal as it is, on the basis of the following:

- **The proposal is based on inaccurate impact assessments.** With the intention of downplaying the socio-economic impact that its proposal would have, the Commission states in its second impact assessment published in June 2013, that deep-water fishing accounts for approximately 1.5% of the fish landings from the North-East Atlantic. It also affirms that only "*some coastal communities*" depend, to a greater or lesser extent, on this fishery, such as those based in the French Atlantic ports of Brittany and Normandy as well as in Scotland, Galicia and the Basque Country. What the Commission fails to mention is that these are all communities depending on fisheries and that, in the current context of crisis, it will be extremely difficult for the people working on board the vessels concerned by the proposed ban to find an alternative employment.
- The Commission's **proposal disregards the opinion** of the Member States, the Regional Advisory Councils (particularly the LDRAR, NWWRAC, SWWRAC, and NSRAC), the Scientific Committees of the NAFO and of the NEAFC which do not recommend nor back a ban on individual deep-sea fishing gears.
- At present, **bottom trawling is the only viable way to catch certain species.** If banned at short notice (as intended) revenues and jobs will be lost in this sector. Bottom trawls cannot be demonised because when properly used it is the only way to exploit other fisheries without compromising their sustainability.
- **Not all the sea ground is made up of coral reefs and sponge gardens.** Huge parts are made up of sand or mud. There must be a sound-scientific assessment of what areas need an

¹ Europêche/Cogeca and ETF

absolute protection and what areas can be exploited in a sustainable way. A “one-size-fits - all” approach does not make sense in this context.

- The 2012 assessments and advice from the international scientific community (ICES) recognised that the exploitation of deep-sea species stocks had been brought to a sustainable level. In fact, the sustainability of the exploitation of main targeted stocks (grenadier, black scabbardfish, and blue ling) is widely established, **reaching maximum sustainable yield (MSY) levels**.
- The proposed measure will have no effect in international waters since it will not be in line with measures adopted by NEAFC. It will only be applied to third-countries fleet, causing a patent **economic competitive disadvantage for EU fishing vessels**.

Socio-Economic Impact

Of a total of 37 579 EU vessels reported to be operating in the Atlantic (Data Collection Framework data)², **4 456 vessels** have reported some catches of deep sea species during the year 2011. This group of vessels represents about **12% of the EU Atlantic fleets**. These significant figures do not seem to be taken into account by the Commission in its proposal.

At a national level, DEFRA (UK Department for Environment, Food and Rural Affairs) estimates that, based on recent fishing patterns, over 400 active UK vessels would be affected by the Commission proposals, which is approximately 10% of all active UK vessels.

According to MAGRAMA (Spanish Ministry for Agriculture, Food and Environment), a ban of bottom trawls and gillnets would concern all vessels capturing more than 10% of deep-water species (60 trawlers and 11 longline vessels under 100 Gross Register Tonnage GRT) as well as to 100 trawlers and 85 gillnet units operating in Northwest Cantabrian waters and 140 trawlers in the Gulf of Cadiz.

As for France, only taking into account the ports of Lorient, Boulogne-sur-Mer, Concarneau and Guilvinec approximately 500 direct jobs (32 vessels from 24 to 46 meters have a license to aim at deep sea species) would be affected by the proposal.

Deep-sea fishing plays a fundamental role in the economies of these maritime regions. It should be recalled that **one single job at sea represents 3.2 jobs onshore**. For this reason, the application of the proposed regulation would have a greater impact than the one foreseen by the European Commission in the above-mentioned impact assessment.

Conclusion sand recommendations

Since 2002 the fishing industry in accordance with European and International legislation has been **greatly decreasing the fishing effort and respecting vulnerable marine ecosystems** and this remains a major priority for the deep-sea fishing community.

The SSDC-SF would like to emphasize that this dossier as it is will set a dangerous precedent, and that the adoption of an excessive and not scientifically based proposal would be an

² Included in the complementary information to the Commission's Impact Assessment (SWD(2012)203 final)

extremely negative signal for the entire fishing industry, paving the way for reconsideration of the legitimacy of other types of fishing, particularly bottom trawling.

Social Partners believe that simply banning the use of deep-sea trawls and gillnets is a disproportionate and poorly conceived approach that will bring the sector catastrophic consequences. The international rules currently implemented in North-Atlantic waters are far better suited to the development of a **modern, environment-friendly European deep-sea fishing sector**.

Therefore, as an **alternative to a ban**, the **SSDCSF promotes the implementation of the FAO International Guidelines for the Management of Deep-sea Fisheries in the High Seas**, positively assessed by the UN at the international level and throughout the EU. It will create a level playing field for deep-sea fishing so that EU vessels are not at an economic competitive disadvantage compared to third-countries.

The SSDCSF considers that better scientific knowledge and controlled fishing of these species, combined with other technical and support measures, would allow striking the **right balance** between the protection of vulnerable habitats and species and the economically, socially and environmentally sustainable exploitation of resources. Consequently, effortless condemnation of bottom trawls and bottom-set gillnets could prove unreasonable.

The European Parliament's report is scheduled to be voted in the Committee on Fisheries on 17 October 2013 and in the December Plenary Session. The EU Social Partners strongly call on the **EU Parliament not to second the proposal as it is**, which, if adopted, would have serious consequences for the fishing industry and will affect the viability of yet fragile coastal communities, particularly some local fishing ports highly dependent on deep-sea fisheries.
