

European Association of Fish Producers Organisations
Association Européenne des Organisations de Producteurs dans le secteur de la pêche



EAPO / AEOP
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By e-mail to : NORTH WESTERN WATERS ADVISORY COUNCIL
Attn Mr. Bertie ARMSTRONG - Chairman

EAPO15-29

Zeebrugge, 30 October 2015

Dear Bertie,

Subject: Phasing of the Landings Obligation 2017-2019

I am writing in reference to the North Western Waters Advisory Council's (NWW AC) request for members' thoughts on the phasing of the landings obligation 2017-2019. I write on behalf of the EAPO NWW Working Group, in which POs are represented from Belgium, France, Ireland, the Netherlands, Spain and the UK who are also members of the NWW AC.

You are, I am sure, fully aware of the disquiet that is felt throughout the fishing industry that the implementation of the landings obligation is pushing ahead without the thorough impact assessment that would normally be expected as part of good governance and duty of care.

Even without a comprehensive impact assessment, it is completely foreseeable that as things stand the landings obligation, even if all the quota flexibilities and exemptions are applied, will result in serious chokes that will jeopardise the economic viability of the fleets concerned. This alone is not a reason to forsake the landings obligation but it is strong reason to proceed with extreme caution. What is required is an adaptive approach that learns as it goes and clears obstacles before it is applied.

It would, in our view, be utterly irresponsible for member states and the Commission to proceed to add new species to the landings obligation without making clear how chokes are going to be addressed. We stand ready to work with the NWW AC and the member states in addressing these issues but we cannot countenance putting our name to the inclusion of additional species that would in effect lead to the ruin of our industry.

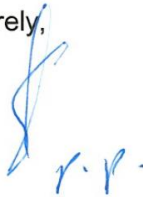
Without a clear understanding of what is going to be done to mitigate the foreseeable problem of serious chokes that will prevent our members from catching their principle economic quotas, we are adamant that member states should not take a further step into the dark.

It is not our desire or intention to be melodramatic. But it would be a serious dereliction of our duty to our members to sign up to NWW AC advice that would if followed lead to their demise. In addition consideration should be given to the consequences that will be felt by the wide range of ancillary businesses that rely on the catching sector.

Sooner or later it will be necessary for all of the management authorities to recognise the reality that the landings obligation, as currently configured is incompatible with the current policy regime which is largely based on the system of TACs and quotas.

It is our firm view that the NWW AC and member states should address these issues before committing to adding further species in 2017, 2018 and 2019.

Yours Sincerely,

A handwritten signature in blue ink, appearing to be 'P. Trebilcock', written over the closing 'Yours Sincerely,'.

Paul Trebilcock
Chairman NWW WG of EAPO