

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



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

EAPO15-32

Zeebrugge, 24 November 2015

Dear Bertie,

Subject: Phasing of the Landings Obligation 2017-2019

Further to my letter of 30 October 2015 (EAPO15-29) regarding phasing of the landings obligation I am writing to reflect the further thoughts of our members. 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 many of whom are also members of the NWW AC.

Firstly I should reiterate that the clear view of all EAPO NWW WG members is that there should be no further species added to the demersal landing obligation regulations (including no changes to 2016 catch threshold criteria) until there has been some resolution of outstanding concerns raised in our previous letter.

In order to help you present a constructive case in progressing these discussions at the NWW AC we feel the following issues are important:

Scientific Trials

There are a number of gear trials that are ongoing or have been completed in different member states looking at different fisheries and various species selectivity. In addition we are aware that there are a number of scientific programmes looking at survivability rates on various species.

These data from the different programmes and member states should be collated and analysed. This information could potentially offer evidenced sign posting towards the most appropriate species for consideration in the phasing process. This would also flag up species for which gear selectivity and survivability are extremely difficult or not of any assistance.

Quota Uplift

It is important that any quota uplift associated with the implementation of the demersal landing obligation is directed towards those vessels/operators that are demonstrably affected

by the landings obligation. The purpose of any such uplift must be to address the challenges as vessels face the practical and real implementation of the landings obligation.

There is a genuine fear that any quota uplift will be seen as “new quota” and the temptation for member states to use this for domestic political reason is real and indeed there are already clear indications that this will happen. We feel the Commission must act on this issue and give clear guidance/direction to member states.

De Minimis Flexibility

It is important (particularly in the early years) that flexibilities are interpreted and implemented in a pragmatic manner, whilst still complying with the overall objectives of the regulation.

There appears to be a lack of clarity of how/when de minimis can/should be used across different member states. This must be resolved so everybody has the same understanding of when and how de minimis might be used and indeed of the potential implications of using it.

I hope these points are helpful and constructive in moving forward.

Yours Sincerely,

A handwritten signature in blue ink, appearing to be 'PT', written in a cursive style.

p.p. Paul Trebilcock
Chairman NWW WG of EAPO