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**Joint Nature Conservation Committee
Monkstone House
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Subject: Lack of consideration of French fishing interests in the MCZ designation process

Dear Sir / Madam,

The Government of United Kingdom is implementing an ecologically coherent network of Marine Protected Area (MPA) in addition to the current network (Natura 2000, Ramsar sites, etc.), with a new type of MPA, called Marine Conservation Zone (MCZ). This ambitious MCZ network will potentially impact number of economic activities, notably foreign commercial fishing within the MCZs and outside (fishing displacement, indirect impacts on the associated industry...).

To do so, the JNCC invited foreign fisheries representatives to take part in the process in order to take into account their interests in the UK waters and ideally reach consensus on the location and conservation objectives of the MCZ proposals. Indeed, in the context of the Common Fisheries Policy foreign states do have fishing rights in the UK water (EEZ and historical fishing rights between 3/6-12 nm).

Since 2010, French fisheries representatives (the national committee (CNP MEM) and several regional committees (CRP MEM)) have participated in the MCZ designation process in direct relation with the different regional projects: reviewing the different reports, attending meetings and providing the requested information (localization of the main fishing areas, gathering socio-economic data...). Furthermore, they asked their Government to commission a scientific study to characterize French fishing activity in the UK EEZ of VMS-equipped fishing vessels and gathered themselves information on the activity of other fishing vessels.

Unfortunately it is not certain that this huge work has really helped to take into account French fishing interests at their true value. Notably, we were very surprised to learn that no quantitative assessment of economic impacts for French fishing fleets were made, despite a lot of information given to the regional MCZ projects (cf. the draft Evidence Base for the Impact Assessment for Marine Conservation Zones p. 13 "*Values of landing for non UK fleets from pMCZs have not been estimated*" and p.26 "*It has not been possible to make a quantitative estimate of the impact of the pMCZs on non UK fleets*"). Apparently, the provided information has not been considered at all.

Finally French fisheries representatives tend to consider that there has not been a real

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consultation process because their interests were very little considered in the designation process: Pierre-Georges DACHICOURT, formerly president of CNPMEM, had written a letter about it last October but had not had any response from you.


Moreover, this feeling is reinforced by the fact that French fishing interests are not taken into account in the impact assessments.

As a consequence, as long as their interests are not really taken into account, French fisheries representatives withdraw from the MCZ designation process and will go against any management measures developed for foreign vessels in the context of the MCZs network.

Yours sincerely,

The President of CNPMEM,

Gérard ROMITI

A handwritten signature in blue ink, appearing to read 'G. Romiti', written over a faint, larger signature.

Copy :

- Natural England
- DEFRA
- Finding Sanctuary project
- Balanced Seas project
- Net Gain project
- NS and NWW RAC
- French ministry of fisheries

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