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In copy: Line Groth Rasmussen, Sonja Feldthaus

Dear Minister Jørgensen,

In the upcoming AgriFish Council meeting you will discuss the Commission's proposal for the Baltic multi-annual plan (MAP) [2014/0285 (COD)], and in particular the Presidency proposal for a compromise. We urge Member States to adhere to the binding objectives of the Common Fisheries Policy (CFP), to be mindful of the Fisheries Committee vote of 31st March, and to carefully address the following issues:

- **MAP objective.** The objectives of multi-annual plans need to reflect the agreed language in the CFP to ensure consistency and delivery of the policy's objectives. Article 3 of the Commission's proposal does not include language on restoring and maintaining fish populations above levels that can produce the maximum sustainable yield (MSY), which is a core objective of the new CFP. Furthermore, the proposal seems to establish different objectives for different types of stocks. This is not in line with the CFP, which states that populations of <u>all harvested species</u> should be restored and maintained above MSY levels, i.e., for all stocks. Therefore, Article 3 must be adapted to set the clear objective to restore and maintain all harvested species above levels capable of producing the MSY.
- **Sustainable fishing mortality rates.** Article 2.2. of the CFP requires exploitation rates (F) that restore and maintain populations of harvested species above levels which can produce the MSY. Therefore, F ranges in Article 4 must be set below F_{MSY} levels. Yet, the Commission requested that ICES provide values for fishing mortality <u>around</u> F_{MSY}, and these values were subsequently integrated into the Commission's proposal in Article 4. The UN Fish Stocks Agreement identifies

F_{MSY} as a minimum standard for an upper limit reference point which is in line with International Council for the Exploration of the Sea (ICES) framework for advice. As a consequence, the proposed F ranges exceed the MSY exploitation rate F_{MSY} and are therefore inappropriate.

- **Conservation reference points.** The Commission's proposal is framed to react if stocks fall below the Minimum Spawning Biomass level (Article 5). This is a level well below the biomass which can produce MSY (B_{MSY}), and represents a level where the risk of stock collapse is increased. The proposal therefore lacks the ambition of the agreed CFP to restore and maintain stocks above biomass levels capable of producing MSY. The proposal should be amended to ensure measures are taken as soon as biomass levels fall below B_{MSY} rather than the Minimum Spawning Biomass. Also within the framework of the evaluation of the plan and consistent with the CFP, the Commission should report on progress towards restoring and maintaining fish stocks above levels capable of producing MSY on an annual basis.
- **Ecosystem-based approach.** Implementing the ecosystem-based approach is a fundamental objective of the CFP (Article 2.3). The multi-annual plan must therefore include wording under Article 3 that reflects the need to protect the wider marine environment, contribute to achieving Good Environmental Status, and integrate the ecosystem-based approach to fisheries management. In addition, the plan needs to encompass measures to minimise the impact of fisheries on the marine ecosystem and to avoid degradation of the wider marine environment. This includes minimising the impact on seabirds, marine mammals and the integrity of the seabed.

Levende Hav, Danmarks Naturfredningsforening, Greenpeace Denmark, Oceana, WWF Denmark, and Dansk Ornitologisk Forening / Birdlife Denmark acknowledge that the Fisheries Committee of the European Parliament has taken steps to address the issues above and are urging member states to demonstrate the same level of ambition to implement the reformed CFP.

We look forward to working with you throughout the negotiations on the Baltic MAP and are available for any questions or feedback you might have.

Yours sincerely,

Björn Stockhausen, Seas At Risk

Henning Mørk Jørgensen, Danmarks Naturfredningsforening

Erik Bjørn Olsen, Levende Hav

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