



# Joint NGO priorities on the Multi-annual Plan for the North Sea

November 2016

## We call on MEPs to support the Commission's proposal to:

- Ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce the Maximum Sustainable Yield (MSY) (Articles 3(1), 8(1) and 8(2));
- Contribute to the elimination of discards by avoiding and reducing, as far as possible, unwanted catches (Article 3(2));
- Implement the ecosystem-based approach to fisheries management and ensure coherence with the objective of achieving good environmental status by 2020 in the Marine Strategy Framework Directive (MSFD) (Articles 3(3) and 3(4));
- Allocate fishing opportunities in accordance with the likely catch composition (Article 10(1)).

## We call on MEPs to amend the proposal to ensure that:

- Recovery targets to restore stocks to levels above those capable of producing MSY apply to all harvested stocks, with corresponding safeguards and specific timeframes;
- Ranges of fishing mortality are limited to those that will meet the requirements in Article 2(2) of the Common Fisheries Policy (CFP) for all harvested stocks. For stocks with MSY-based reference points, this means that  $F_{MSY}$  should be the upper limit;
- The plan is coherent with the Birds and the Habitats Directives, including measures to minimise the impact of fishing on sensitive species and habitats;
- Measures to implement specific regional aspects of the landing obligation are set out in the plan;
- Effective and robust monitoring and enforcement of provisions are highlighted as key conditions for the successful delivery of North Sea Multi-annual Plan (MAP) objectives.

### Contacts:

Björn Stockhausen	<b>Seas At Risk</b>	<a href="mailto:bstockhausen@seas-at-risk.org">bstockhausen@seas-at-risk.org</a>	+32 2 893 0968
Bruna Campos	<b>BirdLife Europe</b>	<a href="mailto:bruna.campos@birdlife.org">bruna.campos@birdlife.org</a>	+32 2 238 5099
Flaminia Tacconi	<b>ClientEarth</b>	<a href="mailto:ftacconi@clientearth.org">ftacconi@clientearth.org</a>	+32 2 808 4322
Henrike Semmler Le	<b>Oceana</b>	<a href="mailto:hsemmler@oceana.org">hsemmler@oceana.org</a>	+45 3 165 5863
Rita Santos	<b>WWF EPO</b>	<a href="mailto:rsantos@wwf.eu">rsantos@wwf.eu</a>	+32 2 761 0422
Vera Coelho	<b>The Pew Charitable Trusts</b>	<a href="mailto:vcoelho@pewtrusts.org">vcoelho@pewtrusts.org</a>	+32 2 274 2863

## MANAGEMENT TARGETS

The Commission proposes grouping stocks in seven categories, each with its own targets and safeguards. The CFP objective to restore and maintain fish stocks above levels capable of producing MSY applies to **all harvested species**. NGOs strongly oppose fishing above the  $F_{MSY}$  point estimate, as this undermines the core objective of the CFP and contradicts international agreements. Fishing mortality for all stocks, regardless of their group, should be set at levels not exceeding  $F_{MSY}$  as soon as possible and no later than 2020. A provision should be introduced stipulating that measures under the plan shall be taken in accordance with best available scientific advice, in line with CFP Article 3(c).

## STOCK RECOVERY OBJECTIVES

The recovery objectives should apply to all North Sea stocks, but the proposed MAP stipulates that stocks in groups 3, 4 and 5 shall be managed “in line with the precautionary approach”. The CFP refers to the definition by the United Nations Fish Stock Agreement (UNFSA), which is much stronger than the “precautionary approach” applied by the International Council for the Exploration of the Sea (ICES). ICES’s precautionary reference points relate to stock growth and risk of collapse and are not sufficient for delivering the MSY objective. Other fisheries management measures which give a comparable degree of conservation of the relevant stocks must be included in the MAP, in line with CFP Article 9(2).

## TIMEFRAME

Article 3(1) should require achieving the target exploitation rate at the latest by 2020 for all stocks, with the commitment to work towards it on a progressive and incremental basis in line with the CFP.

## ECOSYSTEM-BASED APPROACH AND ENVIRONMENTAL LEGISLATION

The MAP should include measures in line with the requirements of the MSFD and of the Birds and Habitats Directives. Conservation measures must be introduced to protect seabirds and cetaceans, support the management of Natura 2000 sites and identify and protect fish stock recovery areas.

## LANDING OBLIGATION

Measures for the implementation of the landing obligation in the North Sea should be included in the MAP with the aim to avoid and reduce unwanted catches. Recital 32 of the CFP specifies that the landing obligation should not jeopardise the MSY objective nor lead to an increase in fishing mortality. We welcome the proposed Article 10(1), requiring member states to ensure that the composition of the quotas allocated to vessels in mixed fisheries is appropriate to the likely composition of the catch.

## EVALUATING AND ADAPTING THE PLAN

The MAP includes a review clause, but does not include details on the reference points that would inform an evaluation of the MAP’s effectiveness in delivering its objectives, those of the CFP and GES. We propose that the Commission is empowered to adopt delegated acts as a means of keeping fishing mortality and biomass reference points updated in line with new scientific evidence.