



FISKIMÁLARÁÐIÐ

European Commission, DG Environment
Unit F3 - Multilateral Environmental Cooperation

Fiskivinnustovan
28. apríl 2017
Mál: 16/00260-24
(at tilskila í svári)

Att: Jorge Rodriguez Romero, Acting Head of Unit

Víðgjort: USW

Tygara skriv:

Dear Jorge Rodriguez Romero,

I refer to your letter of 23 February 2017 concerning the legislation designed to implement the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in the European Union – Consultation concerning the importation of the Porbeagle shark in the EU.

Although the CITES Convention does not apply to the Faroe Islands, we appreciate the opportunity to comment on the legislation.

ICES advice for Porbeagle (*Lamna nasus*) (in Faroese: Hemari) in the Northeast Atlantic (Published 9 October 2015):

“The Porbeagle stock in the Northeast Atlantic is expected to be one single stock. There is no information on abundance or exploitation, and the precautionary approach is applied.

ICES advises that when the precautionary approach is applied for Porbeagle in the Northeast Atlantic, fishing mortality should be minimized and no targeted fisheries should be permitted. This advice is valid for 2016 to 2019.

ICES advises that fishing mortality should be minimized; therefore, any possible provision for bycatch to be landed should be part of a management plan which includes close monitoring of the stock.”

In the NEAFC Regulatory Area the NEAFC Contracting Parties have adopted a ban on all directed fishing of porbeagle for the period 2016 to 2019.

Porbeagle was formerly caught by Faroese vessels in a targeted long-line fishery. This targeted fishery has ceased before year 2000.

Today, porbeagle is caught by Faroese vessels as unavoidable by-catch in trawl fisheries and coastal fisheries with long-line and jigging reel. However, these catches are very low, and the present fishery is not expected to affect the level of the stock. Furthermore, there is a discard ban in all fisheries in Faroese waters, which has been in force since 1994.

Since there is a discard ban for Faroese vessels, the Faroese catches of porbeagle shall be landed and sold. Therefore, it is necessary to have the possibility to export the porbeagle to other countries, hereunder EU countries, and we would therefore oppose the proposed restrictions on trade, especially since the catches of porbeagle are unavoidable by-catches.

Ministry of Fisheries

FISKIMÁLARÁÐIÐ

The Faroe Islands, along with other countries in the Northeast Atlantic, do not have a management plan for porbeagle. Since this is not a target fishery, the catches are only unavoidable by-catch, and the catches of porbeagle in Faroese waters are very low. Faroese porbeagle landings in 2015 were 7 tonnes and in 2016 the landings were 3 tonnes.

If there is total landing ban in force, including landing of unavoidable by-catch, there will be no available information on the catches and on the fishing mortality for ICES to apply in its evaluation of the status of the porbeagle stock.

Since porbeagle is listed in CITES Appendix II, the Faroes will issue an export permit for the small unavoidable by-catches of porbeagle by Faroese vessels, and we would certainly expect the import country to issue an import permit, hereunder EU member countries.

We do not support the decision by the Scientific Review Group and EU Member States not to issue any import permits for porbeagle from the Faroe Islands. Our view is that management should be based on sound scientific assessment of individual stocks and appropriate national and regional regulation of the specific fisheries, rather than trade restrictions on a global basis for the entire species.

Yours sincerely



Ulla S. Wang

Senior Adviser