Barcelona, November 21st

Dear

After receiving the stakeholders’ consultation document on the fisheries control system and attending the Workshop, please find below IFSUA’s suggestion on the issues that we consider relevant to our interests.

REPORTING AND TRACKING FOR VESSELS < 12m

We strongly support the measure suggested in your document and the definition of the problem. Indeed, usually small-scale vessels < 12m target vulnerable inshore species, highly valuable both economically and ecologically. Taking into account that these vessels are, by far, the most in the EU commercial fleet, if a proper management of these species wants to be achieved reporting all catches, without exception, is a must.

CONTROL OF RECREATIONAL FISHERIES

We agree with the definition of the problem, recreational fisheries should be controlled for a proper ecosystem based management, but we consider that the actions suggested should be improved.

Concretely, the registration of recreational fishing vessels should be extended to all recreational fishers (including shore based anglers and spearfishers). Indeed, there are some studies' that demonstrate that shore anglers have a considerable higher impact on some key stocks than recreational vessels or spearfishers in some parts of the EU. This should be done through a free register, common for all countries (in order that data obtained is standard), probably managed from the EC. With current online and app technology, this shouldn’t be expensive.
Regarding the licence suggested for some species, we think that it would be very problematic because some countries have already several compulsory recreational fishing licences. Adding one more licence for each species that is subject to a special management plan would end up putting too much pressure and bureaucracy on recreational fishers, thus seriously limiting their will to cooperate.

We consider that the same objective can be achieved with the compulsory general register that we suggested before together with the compulsory declaration of catches for these species.

In case that App technologies are considered, we suggest to take into account recent papers\(^1\) that have studied the issue in detail.

For any further question that could arise, you can contact us at ifsua@ifsua.net

Sincerely,

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