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Concerning the “WORKING DOCUMENT WORKSHOP ON EVALUATION OF REGULATION (EC) 1224/2009 ON FISHERIES CONTROL”

I have three comments to the working document on behalf of the European Anglers Alliance (EAA), and the European Fishing Tackle Trade Association (EFTTA).

It is said on page 5:

“Finally, as recreational fisheries have an increasing influence on fish stocks and the marine environment, the Control Regulation envisages control measures for this activity, such as the registration of catches.”

That’s a surprise to me. I am not aware that the Commission or anybody else has data to support that claim. Within recreational fisheries there is a notorious lack of time-series and trend figures. It would be good if the consultation document in the main text or in a footnote brought some evidence for this claim. It would be good to know what fish species and areas where this claim is evidenced and justified.

The only thing which seems to be on the increase for sure is the interest in the catches by recreational fishers. Indeed, the recreational fishing sector does catch more than a few of some fish species in some places – but more than in the past? I doubt it. In reality, what has happened recent decades is that more and more fish stocks have been depleted by commercial fishing. On that back-ground it could be justified to claim that recreational fishing’s impact on certain stocks have increased recent years, but relatively, and only because these stocks have been depleted by commercial fishing!

A few cases for thoughts:

- **Tuna:** Recreational fishing for tuna is regulated under ICCAT. Recreational fishing is allowed a quota of only ca. 1%. 99% is allocated to the commercial sector! If there is a problem with tuna, the most significant problem is that too little tuna quota is allocated the recreational sector and too much to the commercial sector, which has depleted the stock.

- **Sea bass:** Until the 70s sea bass was by and large caught by recreational anglers only with very little commercial fishing involved. Then the commercial fishing took off and the stock is now depleted. This year anglers are not allowed to land any bass during the first half of 2016 and only one bass per day during the second half of 2016. This cuts recreational fishing mortality for this species but in a way where a great part of the recreational fishers simply give up fishing. Compared with the bass management measures for commercial fisheries, recreational fishers are hit much harder than the commercial fishers, of which a great number are affected very little or not at all.

- **Salmon:** A lot of salmon stocks have been made extinct – in particular in the Baltic Sea area - for various reasons, which has nothing to do with recreational fishing. On the contrary, many stocks are totally dependent on anglers' efforts to keep them alive and manage well the recreational fisheries for them. In the Baltic Sea commercial fishing for salmon is still allowed at open sea where salmon from both threatened and not so threatened salmon stocks are caught indiscriminately.

So, I would like to ask again: Where is it that “recreational fisheries have an increasing influence on fish stocks and the marine environment”?

Some other important issues:

- **Flaws in the definition of commercial and recreational fishing:** The EU legislation operates with two catching sectors only: Commercial fisheries vs. recreational fisheries/non-commercial fisheries. However, some countries operate with a sector in between, 'subsistence fisheries', or traditional or artisanal fisheries or something similar, which are not well defined. Very often catches from this/these segments have been – and maybe still are - wrongly counted as recreational catches. These subsistence fisheries should be licensed for what they are: commercial fisheries. When that has happened the recreational fisheries for this reason alone “will have less influence on fish stocks and the marine environment than previously thought”

- **The term ‘Recreational Fisheries’ covers various kinds of fishing, which should be dealt with separately:**

For proper data collection, control and management the sub-segments of recreational fishing need to be dealt with separately (nets, lines, pots, harpoons, rod & line/angling..) as they impact very differently the stocks and environment.

- **More recreational fishing data is badly needed – both catch- and socio-economic data:**

There is very little recreational fishing data available to establish reliable catch & effort time-series. Trend studies are very scarce and based mostly on guestimates, less on good quality data. We have no doubt, that there will be provided more recreational fishing catch data this year and in the future (it is made part of the ICES/Commission 2016 work programme). But our decision makers also need socio-economic data to be able to make informed decisions about fisheries management, allocation of catch opportunities etc.!

Best regards,

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