



Associação Portuguesa para o  
Estudo e Conservação de Elasmobrânquios  
Representante oficial em Portugal da *European Elasmobranch Association*

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**Subject:** Recommendations for Reform of the Common Fisheries Policy

Dear sirs,

The *Associação Portuguesa para o Estudo e Conservação de Elasmobrânquios* (i.e. Portuguese Association for the Study and Conservation of Elasmobranchs) was founded in January 1997 and its nearly 200 membership is mostly comprised of both students and research who work in marine biology, specifically on elasmobranch fisheries biology.

Our activities predominantly revolve around supporting scientific research and disseminating relevant and valid information throughout schools, from kindergarten all the way to graduate and post-graduate studies.

We cordially invite you to learn about our activities at [www.apece.pt](http://www.apece.pt) and we specifically recommend the webpage [www.apece.pt/apece\\_bolsas.html](http://www.apece.pt/apece_bolsas.html), where you will find about our multiple scholarship awards.

We are also deeply involved with the Shark Alliance, Shark Trust, Ocean 2012 and other organizations focused on protecting (specifically) Elasmobranchs but, in essence, the marine environment.

After this brief introduction about our organization we would like to submit the following recommendations to your appreciation:

- 1) Additions to TAC limited species
- 2) Reduction of operating licenses for deep-water longlining
- 3) Reduction of operating licenses for surface longlining

### 1) Addition to TAC limited species

Let us first start by complimenting you on the establishment of a table of elasmobranch species subjected to TACs. This has long been an advice from multiple scientists and we were rejoiced to watch this legislation pass.

However, the fact that some species were left out is causing some disturbance, specifically in Sesimbra (Portugal), where 17 deep-sea longliners target Black-scabbard (*Aphanopus carbo*) while bycatching massive quantities of Leafscale Gulper shark (*Centrophorus squamosus*) and Portuguese Dogfish (*Centroscymnus coelolepis*).

The disturbance is that commercial fishermen are catching and landing both *C. squamosus* and *C. coelolepis* and calling it "Lusitano", which is the common name for *Centrophorus lusitanicus*, a species **not** affected by TACs.

As such, it is critical that *Centrophorus lusitanicus* is **included** on the list of species affected by TACs, otherwise all landings will **remain the same** as before, simply **renamed** from *C. squamosus* and *C. coelelepis* to *C. lusitanicus*.

This, needless to say, has a profound impact on the deep-sea community controlled by these sharks (which act as predators in this environment) and also completely **voids** any relevance to **official landings data**, which therefore become **unusable**.

## 2) Reduction of operating licenses for deep-water longlining

Our second point is, not-expectedly, wholeheartedly supported by local fishermen, who agree **too many vessels** are currently operating in this industry. Furthermore, fishermen point out the **absence of logic** in the establishment of the number of operating licenses, currently at 48.

You will be surprised to know the Portuguese Government issues 48 operating licenses for deep-water longlining per year, whilst **only 17** vessels are **actually operating**.

This discrepancy clearly **depicts** how weak the link is between decision makers and **reality**. Only when such a link is feeble, at best, do decision makers award operating licenses that supersede **needed** licenses by a factor of 3.

We maintain close contacts with most local commercial fishermen and we can assure you most favor a decision of having no more than **10 to 12** deep-sea longliners operating in the area.

## 3) Reduction of operating licenses for surface longlining

Surface longliners operate mostly from Peniche (Portugal), target Swordfish (*Xiphias gladius*) and are limited to an individual quota of 6 tons per year.

However, I regularly have **students** traveling on these vessels and I can assure you 6 tons is, on average, the amount of Swordfish **landed each trip**. I can also assure you that multiple students have witnessed Swordfish being **landed as Blue-shark** (*Prionace glauca*), which completely nullifies all Blue-shark data for analysis.

On one **specific trip**, one boat caught (and landed) 7.000 Kg of Swordfish but only 350 Kg were declared as such. The remaining 6.650 Kg were landed as Blue-shark. This is a **mis-reporting factor of 20 (twenty)**, which has a **serious impact** on the analysis of official landings data, to say the least.

However, after years of working with commercial fishermen, we have grown to *partially* empathize with them, as we have learned to understand that such rule-breaking schemes are **not done for profit** but mostly for **survival**.

Deep-water and surface longlining fleets have grown in recent years due to funding and political support. Catch restrictions have now limited these fleets' activities to the point where they are **commercially insolvent**. In other words: money was advanced to build vessels; but restrictions prevent the very same vessels from making a living.

In light of this scenario, there are only **three possible solutions available**:

- 1) **Miraculously** boost marine biomass in the oceans to the point where no longer fishing restrictions are required – hardly a feasible scenario.
- 2) Impose **draconian** measures that insure legislation is followed to the letter – the practical result of this being **financial insolvency** of most fishing companies.
- 3) **Decreasing** the number of operating vessels, ensuring those remaining in action are **allowed** to catch quantities that render their financial turnover **positive** – truly the only possible solution, as the previous two are impractical.

In summary, our suggestions are mostly focused on **practical aspects** and favor a more **efficient** fishery, which necessarily implies **better use of marine stocks**.

Our focus is to put forward **positive** scenarios that strengthen the bond between policy-makers, commercial fishermen and marine biologists as, in the end, **all crave the very same goal**, which is a more **sustainable** use of the oceans.

In light of this philosophy, and **recent examples** caught in the **field**, we strongly believe management should be focused on **decreasing effort**, rather than **catch**.

We believe the new Common Fisheries Policy needs to **admit** errors in past policies, mostly the fact that **catch controls** are grossly mis-followed and largely ignored (particularly in the examples outlined above).

The focus should be on **diminishing effort** and please trust us when we say commercial fishermen **largely favor** this philosophy, and this affirmation comes from **years** of working with these professionals **in the field**.

Please do not hesitate to contact us if you require any clarification on the matters outlined above and accept our sincere wishes for a phenomenal 2010, which, we hope, will truly see a **positive change** towards a more **enlightened and intelligent** use of the oceans.

Very truly yours,

Nuno Queiroz & João Correia  
APECE

PS – Your Green Paper featured the email address [mare-cfp-consultation@ec.europa.eu](mailto:mare-cfp-consultation@ec.europa.eu) for sending recommendations but all messages we sent there bounced back, even when using the address [joao.correia@apece.pt](mailto:joao.correia@apece.pt), which is the official address used when registering the APECE on your website.

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