

30 December 2009

Directorate-General for Maritime Affairs and Fisheries  
European Commission  
'CFP Reform'  
B-1049 Brussels, Belgium

Dear Directorate-General for Maritime Affairs and Fisheries:

This letter is in response to the EC Green Paper *Reform of the Common Fishery Policy*, with a focus on the section '5.2. Making the most of our fisheries.'

The general goal of the Common Fisheries Policy (CFP) should be to rebuild healthy marine ecosystems that support healthy fisheries. The mathematical construct of maximum sustainable yield (MSY) can be a tool for achieving this goal, if it is applied as an upper limit to exploitation rather than a target number for fisheries catches. To use MSY as an upper limit, it should be combined with a appropriate, more precautionary target reference points. Such points could include the maximum economic yield (MEY), the precautionary exploitation level  $F_{0.1}$ , or ecosystem considerations to maintain the ecological roles of prey, predators or keystone species. In all cases, such target reference points should result in stock biomasses larger than the upper 95% confidence limit of the biomass capable of producing MSY.

We support the establishment of long-term management plans for fish stocks, where the total allowable catch (TAC) is set according to rules based on the principles above. If a stock falls below the biomass that can produce MSY, then exploitation rates should be reduced quickly and sufficiently to ensure that the stock quickly rebuilds. It is essential that such management plans are not subject to ad-hoc political interference, as is the current practice.

Along with the above fisheries management objectives, we would like to also highlight several other critical components for sound fisheries management in the EU:

- Based on international experiences we strongly advise against the replacement of catch limits with effort management, such as limiting days at sea. Use of effort controls in conjunction with -- but not as a substitute for -- catch limits can be beneficial.
- We agree that the future CFP shall ensure that discarding no longer takes place and that adherence to CFP rules is enforced.
- We want to add that the rebuilding of healthy stocks requires the rebuilding of close-to-natural size and age structures. This will increase the resilience of the stocks and minimize effects of fisheries-induced evolutionary change. It can be achieved by allowing all fish to spawn and preferably targeting fish that have already reproduced several times. No-take zones will be essential to increasing the survival of old, experienced and highly fecund fishes.

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