

European Anglers Alliance, EAA
European Fishing Tackle Trade Association, EFTTA
Rue de la loi 81a
1000 Brussels
Belgium



Tel: +32 (0)2 725 11 15 • Email: info@eaa-europe.eu • Web: www.eaa-europe.eu • www.eftta.com
EAA Transparency Register number: 60105502183-69
EFTTA Transparency Register number: 08955462188-48

Brussels, 7 December 2020

By email only

Att:

- THE WORKING PARTY ON INTERNAL AND EXTERNAL FISHERIES POLICY
- THE PERMANENT REPRESENTATIVES COMMITTEE
- THE COMMISSION, DG MARE

Concerning Sea Bass measures 2021

We, the European Anglers Alliance (EAA) and the European Fishing Tackle Trade Association (EFTTA) represent millions of sea anglers and the industry providing them with fishing tackle.

We have raised awareness for decades about the threat to sea bass from overfishing.

In 2015, at long last, emergency measures were announced¹:

- "Following a lack of agreement between Member States since 2012 on coordinated and effective measures to protect this important stock and another lack of agreement of EU ministers in December's Fisheries Council, on 19 December 2014 the UK made a formal request to the Commission to take emergency measures. The Commission then consulted the Member States involved and analysed the scientific evidence available. On the basis of discussions with all Member States and based on the scientific evidence the Commission has taken its own decision."

Five years have passed with various measures put in place, including bag-limits and closed season for anglers – a closed season which is longer than the one set for the commercial sector. Our members have been very patient and proactive over the years, but feel our sector is disproportionately hurt by restrictive measures. The catch and discard data are questionable for some métiers. And, based on the Council/Member States' latest opinions with regard to the pending revision of the Control Regulation, we expect no fully documented sea bass fisheries the next 4-5 years.

For our members to continue to be patient and proactive we would like to request a few changes to the management measures with regard to the bag-limit, the closed season and the Minimum Conservation Reference size (MCRS). Please adopt:

- **a small change in the bag-limit from the present 2 in 9 months to 3 in 8 months** (both for northern and southern bass). A change to three fish for eight months, would be very similar to two fish for nine months, and within the ICES advice according to the Commission's very own tool (which they have said they insist on using). In effect the 3/8 impact is just under (2 tonnes) the 2/9 impact.
- **one-and-the-same closed season for recreational fisheries in both southern and northern waters**
- **one-and-the-same closed season for commercial fisheries in both southern and northern waters**
- **a harmonised MCRS 42cm for all EU waters** (justification in the annex on the next page).

Sincerely yours,

Fred Bloot, President of the EAA

Olivier Portrat, CEO of EFTTA

Contact: Jan Kappel, Secretary General, EAA
Mobile: +32 (0)498 84 05 23 | Office phone: +32 (0)2 725 11 15

¹ https://ec.europa.eu/fisheries/european-commission-acts-protect-sea-bass-stock_en#:~:text=The%20European%20Commission%20has%20announced,until%20the%20end%20of%20April.

ANNEX - Letter to DG-MARE of 19 November 2020

(also uploaded to www.eaa-europe.org/positions)

Concerning sea bass 2021 – protection of juveniles

For a number of years, the *European Anglers Alliance* and the *European Fishing Tackle Trade Association* have stressed that the difference (from 25cm to 42cm) in the existing minimum conservation reference sizes (MCRS) set for sea bass is inappropriate. To protect juvenile sea bass the MCRS should be not less than 42cm, and the same for all EU waters. Furthermore, different MCRSs in adjacent waters also complicate fisheries management unnecessarily according to STECF and the Commission².

We ask you to support our call and propose to the Council the adoption of a harmonised MCRS of 42cm for all sea bass fisheries, recreational and commercial, in all EU waters with effect 1/1/2021.

SOME FACTS:

1) STECF advice: avoid having different MCRS applying in adjacent waters (June 2020)³:

- "In subarea 8 the mcrs for cod, sea bass and red sea bream, the mcrs proposed for recreational fisheries is greater than the current mcrs for commercial fisheries. However, for the rest of the SWW, the mcrs is harmonised with the current regulations contained in Annex VII of Regulation (EU) 1241/2019.

There is no reason given for the difference in mcrs between the two areas. Extending the increased mcrs to the whole area would increase the benefit of the measure and avoid having different mcrs applying in different adjacent management areas."

2) The Commission suggested in 2016 that the bass MCRS should be 42cm in all EU Atlantic waters⁴

3) Sea bass is one of the most important species to Europe's ca. 10 million sea anglers, and the businesses dependant on anglers' spending, which is estimated 10.5 billion EUR; 100,000 full-time jobs ⁵.

4) Sea bass' spawning size:

- a) the spawning size is the same for all EU waters, but bass grow faster to that size in southern waters.⁶
- b) at 42cm only ca. 50% female bass have reached spawning size.

5) The commercial bass fishery and the market:

- a) the bigger bass fetch higher prices on the market per kg, which is, should be, an incentive to catch and land the bigger bass.
- b) unfortunately, the discard ban does NOT apply to the bass fishery. Undersized bass are caught legally in nets with smaller mesh than needed to only catch bass at or over the set MCRS - then discarded.
- c) more than 90% (93.5%) of bass on the market are farmed: 81.852 ton vs. 5.337 ton wild (2016)⁷
- d) often restaurants sell farmed bass as wild bass, as the consumers and (some) chefs cannot (or won't) tell the difference. The existing differences in the MCRS adds to this problem.

Sincerely yours,

Fred Blot, President of the EAA

Olivier Portrat, CEO of EFTTA

² "The existence of different MCRS for the same species raises issues in terms of level playing field."; Commission Staff Working Document 20.12.2019 SWD(2019) 453 final https://ec.europa.eu/fisheries/sites/fisheries/files/docs/body/swd-2019-453_en.pdf

³ <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC121260/kj-ax-20-004-en-n.pdf>

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52016PC0134>

⁵ "Research for PECH Committee - Marine recreational and semi-subsistence fishing - its value and its impact on fish stocks"; K Hyder et al (2017); [www.europarl.europa.eu/thinktank/en/document.html?reference=IPOP_STU\(2017\)601996](http://www.europarl.europa.eu/thinktank/en/document.html?reference=IPOP_STU(2017)601996)

⁶ "The size at which 50% of the females are mature (L50%) is 42.14 cm (low limit 41.31 cm and upper limit 43.08 cm)"; ICES WKBASS REPORT 2018; chapter 5.2.1.2 Maturity www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2018/WKBASS/wkbass_2018.pdf

⁷ "Sea Bass in Europe"; EUMOFA (2019) www.eumofa.eu/documents/20178/121372/PTAT+Case+Study+-+Seabass+in+the+EU.pdf