



GREENPEACE



15th of September 2016

Dear Minister for Environment and Food Esben Lunde Larsen,

Cc: Folketingets Fiskeriordfører

The upcoming Council deliberations on fishing limits for 2017 will take place in the context of the reformed Common Fisheries Policy (CFP), which requires an end to overfishing by 2015 where possible, and on a progressive and incremental basis by 2020 at the latest for all stocks.¹

We welcome the fact that in recent years there has been progress in reducing the average level of overfishing by setting more fishing limits not exceeding maximum sustainable yield (MSY) advice. Nevertheless, we note with great concern that, according to the latest report from the EU's Scientific, Technical and Economic Committee on Fisheries (STECF), more than 60% of assessed EU stocks are outside safe biological limits and nearly half of stocks remain subject to overfishing². In the most recent years analysed by STECF, progress towards ending overfishing has slowed down and was on average even reversed³, making additional and urgent efforts necessary to restore stocks to healthy levels. With the 2015 target date having passed, we call on you to ensure that Total Allowable Catches (TACs) for 2017 will not exceed the scientific advice.

During last year's negotiations on Baltic fishing opportunities, Denmark strongly supported setting a quota for the Western Baltic Cod TAC above the recommended levels provided by ICES. The Minister at the time, Eva Kjer Hansen, managed to negotiate the quota upwards, moving away from the scientific advice, away from sustainability and risking the loss of jobs in the fishing sector on a long term basis. These decisions are putting the stock at risk. This year's ICES advice illustrates that the stock has not recovered. According to ICES, the spawning-stock biomass (SSB) has been below the limit reference

¹ [Regulation \(EU\) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy](#), Art. 2.2.

² [Scientific, Technical and Economic Committee for Fisheries \(STECF\) Monitoring the performance of the Common Fisheries Policy \(STECF-16-05\)](#).

³ Idem

point, B_{lim} since 2008 and the fishing mortality (F) has been well above F_{MSY} ⁴. Furthermore, according to the [New Economics Foundation](#), during last year's December Council, Denmark was one of the three countries that benefitted most from fish quota set above advice. According to the study, Denmark secured 52,114 excess tonnage above scientifically advised levels⁵.

This year, we would welcome an unequivocal commitment from you that you will do your utmost to make clear and measurable progress towards reaching the F_{MSY} objectives of the CFP at the Council meetings on fishing opportunities for 2017, and that you will do this in particular for the stocks that are important to Denmark.

In case there are instances where you intend to request a delay in setting fishing limits in line with MSY advice, we call on you to identify these cases and submit evidence, publicly and in a timely manner, showing that continued overfishing is indeed needed in order not to seriously jeopardise the socio-economic sustainability of the fleets involved. In such cases, we ask that you set out how you intend to progressively and incrementally reach the MSY objectives for these stocks by 2020 at the latest.

A large number of Danish and EU citizens followed and participated in the CFP reform process, supporting ministers and members of the European Parliament to agree ambitious targets to end overfishing. The new CFP entered into force three years ago. The decisions you take on 2017 fishing opportunities can reverse the delays in its implementation, put into effect the policies which the public supported, and help rebuild the fish stocks while also ensuring long term sustainability for the catch sector that depends on these resources.

Dear Minister, we look to you to implement these reforms without further delay and urge you to show leadership in ending overfishing, in particular for stocks your fleet is mainly targeting.

Yours sincerely,

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Magnus Eckeskog, Oceans campaigner, Greenpeace Nordic

Lasse Gustavsson, Executive Director, Oceana in Europe

Jan Gruwier Larsen, Marinebiologist, Cand. scient, Senior consultant Danish Society for a Living Sea

Jan Isakson, Director, The Fisheries Secretariat

Henning Mørk Jørgensen, Marine Biologist, Danmarks Naturfredningsforening

Egon Østergaard, Chairman, BirdLife/Dansk Ornitologisk Forening

⁴ ICES Advice on fishing opportunities, catch, and effort Baltis Sea Ecoregion Cod (*Gadus morhua*) in subdivisions 22–24, western Baltic stock (western Baltic Sea) Version 2, 3 June 2016

<http://www.ices.dk/sites/pub/Publication%20Reports/Advice/2016/2016/cod-2224.pdf>

⁵ 2016 New Economics Foundation (NEF) *Landing the blame: overfishing in the Northeast Atlantic 2016*
http://b.3cdn.net/nefoundation/8e7e7e9e94d6ae0270_9jm6bh8as.pdf

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