



ASSOCIATION OF NATIONAL ORGANISATIONS
OF FISHING ENTERPRISES IN THE EU

Dubrovnik, 18 November 2018

EUROPECHE comments to Doc. No. PA1_506B/2018 (Bigeye Tuna)

In view of the current proposal, EUROPECHE wants to make the following statement :

- We are a responsible purse-seine fleet and are very conscious that the recovery of the BET stock needs a balanced effort and sacrifice and contributions of all gears targeting the species.
- For that reason, we are ready to contribute accepting a progressive implementation of extraordinary management measures with an impact on purse-seine fishing like :
 - o Total FAD closure ;
 - o Progressive reduction of FAD numbers ;
 - o And the analysis of supply vessels' activities and their contribution to effective fishing capacity ;
 - o Keeping in mind that the major effort will come with the reduction of the TAC around 30% for the purse-seine fleet, as currently proposed.
- We are concerned with the imbalanced measures proposed, particularly for the purse-seines compared with other gears when purse-seines only represent 33% of all BET catches in the Atlantic Ocean.
- We would like to show our frustration with the practical absence of measures for the long line fleet, responsible of 50% of the BET catches. For instance, it is difficult to understand that 100% of observer coverage is requested for supply vessels that do not catch any BET and only 5% it is requested for long liners.
- We seriously doubt about the effectiveness and control feasibility in reducing juvenile BET mortality (and for that reason we propose to delete them) of the following measures :
 - o Limitation of FAD sets mentioned in paragraph. 21
 - o The recovery of FAD prior to the FAD closure mentioned in paragraph. 19.bis.b).
- Furthermore, we support paragraph. 17.bis and propose to delete 17.ter., because they are inconsistent and are in conflict.
- Additionally, we would like to state that all the measures proposed will certainly be pointless unless there is an effective capacity limitation and management for all gears.

- Finally, EUROPECHE considers that the disposition of currently implemented Recommendation 16-01, paragraph 2 b) should not be applied on the revised data by Brazil as this CPC fails to report in time the mandatory annual catch. We call for a fair application of the recommendation meaning that the part of the TAC over shooting generated by Brazil misreported data cannot be paid back by the rest of the fleet, especially those who complied with their limits like EU purse-seine fleet.