



LONG DISTANCE FLEET REGIONAL ADVISORY COUNCIL

MEP Mme Marie-Hélène AUBERT
Parlement Européen
Bât. Altiero Spinelli
08G210
60, rue Wiertz / Wiertzstraat 60
B-1047 Bruxelles/Brussel

Brussels, 9 April 2008

Ref.: European Parliament draft Report on the proposal for a Council regulation establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing

Dear Ms Aubert,

I write on behalf of the LDRAC regarding the European Parliament draft Report on the proposal for a Council regulation establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing (COM(2007)0602- C6-0454/2007 - 2007/0223(CNS)) for which you have been appointed as rapporteur.

The LDRAC is very concerned to read in your above mentioned report (page 9) that you recommend an amendment of article 4 of the draft Council Regulation leading to a total ban on transshipments-at-sea. You justify this proposed amendment by pointing to the advice of the LDRAC of 6 February 2008 regarding the ban on transshipment-at-sea by vessels fishing only species managed by tuna RFMOs.

This justification is unfortunately inaccurate and misleading, because it is not in conformity with the LDRAC advice. The LDRAC advice only applies for tuna fisheries and trade in tuna products and it cannot be used to justify a general ban on transshipment-at-sea for all species and fisheries.

I enclose again the LDRAC advice for your consideration.

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I would like to underline that a ban of transshipment-at-sea without distinction would be a capital mistake. I draw your attention for example to the situation of the European freezer-trawler fleet. These vessels catch relatively low value species (such as horse mackerel, blue whiting etc.) and can only catch so much per day as can be processed and frozen during one day. Freezer-trawler vessels are very expensive to maintain and to operate and very often operate far out in the (high) sea. The possibility to tranship is imperative for economic and logistical reasons.

Apart from this it is already for a long time common practice that these vessels tranship in the Mauritanian and Moroccan EEZ's, because these vessels cannot enter into the ports there.

Also in the southern Pacific Ocean EU-vessels are obliged to tranship, because it is not allowed for EU-vessels to land in Chilean ports. Landing into Peruvian ports would be very costly because the long distance to the ports (8 to 10 days steaming), which would lead to an unsustainable situation (loss of fish time and extra fuel costs).

If the EP thinks that there is a control issue related to transshipments, a total ban should not be the correct approach. It would jeopardize a viable operation of the ship-owners, who are fully complying with the regulations in place. Instead of this, solutions should be found such as in advance notification of transshipment operations and allowing inspection on board, if needed.

In light of the above mentioned arguments, LDRAC requests you kindly to amend your draft report on this issue – i.e. the justification for the amendment of art. 4 - and to notify this to the European Commission, the Member States and the Council Secretariat.

Yours sincerely,

António Schiappa Cabral
Chairman of the LDRAC

Copies to: DG MARE Mr F. Fotiadis, EP Fisheries Commission Mr Philippe Morillon,
Council Secretariat Mr Angel Boixareu Carrera

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