

FACING THE NEW CHALLENGES OF THE EU FISHERIES CONTROL SYSTEM

HEARING

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SMALL SCALE FISHERY AND CONTROLS

- ▶ The small scale fishery (SSF) is not the “absolute evil” so it should not be penalized on the contrary it **must** be protected;
- ▶ this is the reason why the new proposal of regulation on the controls should need to have some exemptions for the specificity and the dimensions of fishing vessels.
- ▶ The following specific observations are necessary in order not to further aggravate the working conditions of our employees: artisanal fishermen are already grappling with a myriad of limitations that actually compromise their activity.

ART. 9.3 VESSEL MONITORING SYSTEMS

- ▶ SSF vessels (<12 m LoA) are too small to be bound by the obligation to have installed on board a fully functioning device for localization and identification through transmitting vessel position data at regular intervals.
- ▶ It should also be noted that artisanal fishing has a lot of “removeliche” boats, i.e. without engine apparatus.

Proposal: exemption for vessels with L.F.T. <to 12 meters.

ARTICLE 14

COMPLETION OF THE FISHING LOGBOOK

- ▶ **Paragraph 1:** «*The master of each Union catching vessel shall keep an electronic fishing logbook for the purpose of recording fishing activities*».

Proposal: exemption for vessels with L.F.T. <to 10 meters.

- ▶ **Paragraph 4:** «*When compared with the quantities landed or the result of an inspection, the permitted margin of tolerance in estimates recorded in the fishing logbook of the quantities in kilograms of fish retained on board shall be 10 % per species. For species retained on board that do not exceed 50kg live weight equivalent, the permitted margin of tolerance shall be 20% per species*»

Proposal: : We believe that, given the small quantities, *for species retained on board that do not exceed 50kg*, the authorized tolerance should be around 30-40kg for single product

ARTICLE 15 ELECTRONIC SUBMISSION OF THE LOGBOOK. PARAGRAPH 1 AND 2

- ▶ Commission's proposal contemplates only two categories of fishing vessels: > 12 m LoA and < 12 m LoA.
- ▶ We would prefer the following solution: apply the relevant rule on electronic submission of the logbook only to fishing vessels > 12 m LoA with transmission of fishing data:
 - ▶ 1. at least once a day or on return to port for several day trips
 - ▶ 2. only on return to port for daily trips or within 24 hours from the departure

ART. 17.6.B). EXTENSION OF THE PRIOR NOTIFICATION OBLIGATION SET OUT IN PARAGRAPH 1 TO FISHING VESSELS OF LESS THAN 12 METRES' LENGTH OVERALL

- ▶ The empowerment of the EC to extend prior notification to vessels <12 LoA would be a big mistake for the limited size of the vessels (removeliche), the low power engine equipment, the lack of refrigeration systems for maintaining the catches. Prior notification would force small vessels to wait for the return to port for discard.
- ▶ Examples already in force: pre-notifications for tuna, swordfish and albacore.

Proposal: delete article 17