



Dear Members of the European Parliament,

The Low Impact Fishers of Europe (LIFE) platform, BirdLife Europe, BLOOM, ClientEarth, Seas At Risk and WWF would like to express their serious concerns over the current negotiations on the future EU policy on fisheries subsidies, i.e. the future European Maritime and Fisheries Fund (EMFF).

We believe that public money should be spent for public good and that any EU funds should strive for collective benefits rather than individual private gains. Furthermore, we believe that investments must not be harmful to the environment, which in particular with regards to the EMFF means that these do not cause overfishing and pollution, and that they are instead invested in supporting the conservation and restoration of the marine environment and the sustainability of the marine economic sectors.

We are therefore highly concerned by the position adopted last April by the former European Parliament, which reintroduces harmful fisheries subsidies. Specifically, we believe the following harmful subsidies **should be removed** from the Parliament's position:

- Subsidies for the construction of fishing vessels, including for the reclassification, renewal and resizing of vessels, as this would result in overcapacity and therefore lead to overfishing, in contradiction of SDG target 14.6 (by 2020, prohibit certain forms of fisheries subsidies which contribute to overcapacity and overfishing, and eliminate subsidies that contribute to IUU fishing, and refrain from introducing new such subsidies etc.).
- Subsidies for the replacement or modernisation of engines¹ for all vessels as this increases the ability to catch fish quicker, increases overcapacity and leads to overfishing, and is in contravention of SDG target 14.6.
- Subsidies for temporary cessation of fishing activities for periods of 30 days or less as this risks maintaining structural overcapacity and thus contributing to overfishing. Instead, for closures of 90 days or more, and if not supported by unemployment benefit, fishers should be supported through a dedicated scheme that provides them with another form of income and enables them to diversify into another sector. Vessel owners may be supported through a dedicated scheme to utilise their vessels for other purposes and provide them with another form of income if their losses amount to more than 30% of their annual turnover. For small-scale low impact fisheries, such schemes should be included in the Member States action plans for small-scale low impact coastal fishing. If closures of 90 days or more take place as emergency measures, fishers and vessel owners can be compensated up until the dedicated schemes are applied, which should come into force as soon as possible within 45 days.

¹ The control on engine power is clearly insufficient, as found by the European Commission's 2019 report on the topic: 67% of the engine power verified in 15 Member States exceeded the certified engine power or showed indications of non-compliance.

- Subsidies to compensate fishers for scrapping their vessels when there is not a control system in place for removing the fishing license (and associated quota) and ensuring the vessel has actually been scrapped.
- Subsidies to cover operational costs of the aquaculture industry as this leads to market distortions and dependency on public aids.

Fisheries scientists and economists have found that these subsidies will inevitably increase fishing capacity and effort and cause overfishing, in contravention of SDG 14.6 and contradicting the EU position in the World Trade Organisation (WTO) negotiations. Instead, we believe that the EMFF should be spent on:

- Data collection, control and monitoring – where we believe at least 25% of the EMFF should ensure that there is more and better collection of scientific data, transparency and control of the fishing activities, including fishing effort and impacts on the marine environment, as well as to discourage Illegal, Unreported and Unregulated (IUU) fishing.
- Management actions to protect nature at sea – where we believe at least 25% of the EMFF should support, for example, testing solutions to minimise fishing impacts, habitat restoration where these have been damaged by fishing, and co-management committees of Marine Protected Areas.
- Enabling governments to re-allocate and ring-fence quotas for small-scale low impact fishers associations
- Enabling small-scale low impact fishers to develop their own associations and Producer Organizations;
- Supporting the development of collectively owned shore side infrastructure, such as fishing wharfs, ice plants, cold storage, processing equipment, etc.
- Supporting on-board safety **where this does not increase the fishing capacity** and is led by collective projects, such as for equipment (e.g. life jackets, flares, distress signal) as well as training on safety procedures.
- Re-training fishers and diversification from the sector into other more viable economic activities including other services that can be provided by fishers and fishing boats such as eco-tourism or participatory sciences.
- Education including further studies (e.g. business management, fish and marine biology or technical training).
- Support in establishing scientific work to develop social/economic/environmental criteria to fully implement in each Member States the Article 17 of the Common Fisheries Policy regarding quota allocation.
- Support research into low impact aquaculture such as multi-trophic systems, re-circulating systems/ closed aquaculture systems and where these can be beneficial to nature restoration.
- Community-led local development where local coastal communities are able to identify and support their needs.

The position of the former European Parliament is disastrous and short-sighted. It also undermines EU international credibility and its position in current negotiations taking place at the World Trade Organisation to implement the Sustainable Development Goal 14.6, which requires prohibiting harmful subsidies contributing to overcapacity, overfishing and illegal fishing by 2020.

We therefore request the new European Parliament to define its own position. There cannot be sustainable fisheries if the European Union maintains economic incentives to fish beyond ecological limits.

Kind regards,



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