

A BROKEN FISHERIES POLICY DESTROYING OUR SEAS



In the previous issue of The Ocean Inquirer, Greenpeace revealed how the Common Fisheries Policy (CFP) has been corrupted by the vested interests of European Union member states who are putting the short term profits of their industrial-scale fishing fleets over the health of Europe's waters. It exposed how European taxpayer funded fishing subsidies have been paying for the illegal fishing activities of one prominent part of the industrial scale Spanish fleet – the Vidal Family Network – for over 10 years. It also revealed how the Spanish authorities have failed to bring this network to justice despite years of international pressure, and in some cases helped to further their business activities. In this issue, we show how the CFP is financially supporting the ecological crime of deep sea bottom trawling, with a spotlight on France and Spain, the two biggest players in this destructive and economically unviable fishery.

THE FINDINGS ARE UNEQUIVOCAL:

- Too many overly powerful boats taking too many fish
- An unacceptable level of fish discarded at sea
- A failure to adhere to scientific
- Illegal, Unregulated and Unreported (IUU) fishing activities
- Fleets failing to make profit or operating at a loss
- Taxpayer subsidies helping to overexploit fish stocks.

Plenty more fish in the sea? Think again: fish stocks worldwide are being shockingly overexploited. European waters are particularly under crisis – three out of four European stocks are overfished'; that's a frightening 82% of Mediterranean stocks and 63% of Atlantic stocks.² If we keep "fishing as usual," scientists predict that in 35 years our fisheries may be gone. ^{2bis}

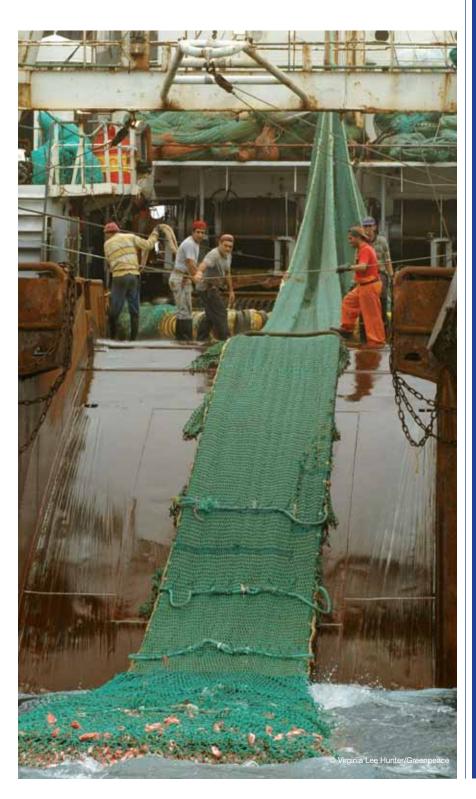
The European Union (EU) has provided a legal framework for its members' fishing activities for 40 years, called the Common Fisheries Policy (CFP). However, this policy is broken, and the European Commission itself has acknowledged the CFP's failure to achieve its original objectives of maintaining fish stocks at a sustainable level and to ensure a profitable and sustainable fishing sector.³

In a perfect example of the EU's failure in fisheries management, the CFP has enabled and financially supported one of the most destructive and unsustainable forms of fishing: deep sea bottom trawling. Because traditional fishing grounds closer to shore have been overfished, fishing vessels now exploit deep waters hundreds of miles from land, in the quest for fish. Deep sea bottom trawling causes senseless destruction, smashing up ancient coral ecosystems on the sea bed and indiscriminately capturing every living thing in its path, only for much of it to be thrown back dead. Scientists worldwide have called for it to end,4 seriously questioning whether these fisheries can be both sustainable and economically viable.⁵ Greenpeace has been exposing this practice as one of the most environmentally destructive and has been campaigning for a global moratorium on these fisheries.

Deep sea bottom trawling is not only an ecological scandal but demonstrates how the EU has created its own worst nightmare through the CFP – instead of supporting a transition to sustainable fishing practices and techniques, public money has been allocated to the largest and most powerful fishing nations, such as Spain and France, without safeguards and criteria to ensure sustainability. EU Member States have used taxpayers' money from all over Europe to finance the construction and moderni-

sation of vessels responsible for plundering the deep ocean. Taxpayers also keep the vessels in operation – fishing so far from shore and so deep is a costly activity, so the EU keeps these ocean bulldozers afloat with subsidies. Indeed, studies have found that without subsidies, most of the world's bottom trawl fleet operating in the high seas would be operating at a loss, and unable to fish.⁶

The broken CFP is currently under review. This reform only happens once in a decade – and could be the EU's final opportunity to turn the tide. The new CFP must put an end to destructive and unsustainable fishing practices, like deep sea bottom trawling, and support selective, low-impact, small-scale fisheries.



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THE HIDDEN ECOLOGICAL CRIME OF DEEP SEA BOTTOM TRAWLING

Some bottom trawlers' nets have openings as wide as football fields.

The high seas – those waters beyond national jurisdiction – cover some 64% of our world's oceans. Most of the deep sea is unexplored by science, but we do know it is full of life – unusual creatures that can survive the darkness and intense pressure. However, while science is yet to understand this last great wilderness, new technology has enabled fishing vessels to access deeper and deeper waters – in an indiscriminate and destructive manner.

The deep sea typically supports marine life that is particularly sensitive to disturbance. Many species are delicate and slowgrowing, such as cold-water corals that have grown into beautiful structures rising up to 35 metres. Science has revealed that some of these corals live up to 8,500 years old, and that there are more species of corals found in the deep ocean than in shallow water tropical seas.⁷

Deep sea fish such as the orange roughy can outlive humans, reaching ages of up to 150 years, and do not mature or reproduce until they are over 20 years old. Different species of redfish mature at 10 – 13 years old and can live for up to 75 years. Crabs, basket stars, prawns and octopuses within the habitats provided by delicate sponge gardens and coral forests, form a complex and fragile web of marine life.

Deep sea bottom trawlers are laying waste to these oases of the deep. Deep sea trawlers drag huge nets with heavy doors and rollers across the sea bed, capturing everything in the trawler's path and destroying vulnerable habitats. The trawlers operate at depths of 400 to 1500 metres and some nets have openings as wide as football fields. Bottom trawling is one of the most destruc-

tive fishing practices ever developed and is presently the most immediate threat to deep sea biodiversity on the high seas – in just one sweep, a single bottom trawler can obliterate a coral-based ecosystem that may have taken thousands of years to grow. Deep sea bottom trawling is also an extremely unsustainable way of fishing slowgrowing, deep sea fish stocks.

This indiscriminate fishing method kills vast numbers of fish and other animals in order to catch just a few target species. On average, between 30% and 60% of the contents of the net are thrown back overboard as bycatch, dead or dying. In some areas, 78 species have been depleted by deep sea fisheries while only three or four were actually targeted. The situation is in fact a lot worse, as much of the damage that happens on the sea bed does not end up in the nets and therefore goes unrecorded.

Any disturbance to the unique and vulnerable deep sea environment has long-lasting consequences, and the damage to deep sea ecosystems can take hundreds of years to recover. In fact, deep sea bottom trawling is already responsible for a number of deep sea species stock collapses, such as the orange roughy in the North East Atlantic, which is overexploited. Deep sea bottom trawling can be compared to clear cutting a rainforest and mining it at the same time – because it indiscriminately destroys and plunders the resources so drastically and so fast that they cannot recover.

The International Council for the Exploration of the Seas (ICES) estimates that 100% of all catches taken from deep sea stocks in the North East Atlantic by the EU individually or jointly with other countries



are outside safe biological limits.10

In 2006, 1,452 marine scientists from 69 countries around the world signed a statement expressing profound concern "that human activities, particularly bottom trawling, are causing unprecedented damage to the deep sea coral and sponge communities on continental plateaus and slopes, and on seamounts and mid-ocean ridges". Never before had such a large number of marine scientists united around a call on such a specific marine environmental issue. 10bis



Despite the alarming state of deep sea fish stocks, the international and European legal framework around deepseabottomtrawlinghas failed to prevent overfishing and deep sea destruction. Moreover, the European Common Fisheries Policy has fostered and supported destructive fishing practices and overfishing.

A PATCHWORK OF RULES AND REGULATIONS

Deep sea fisheries are regulated differently depending on where they take place. On the high seas, deep sea fisheries are primarily managed by Regional Fisheries Management Organisations (RFMO), such as the North East Atlantic Fisheries Commission (NEAFC) or Northwest Atlantic Fisheries Organisation (NAFO), depending on the area they are practised.

The EU Deep Sea Regulation, which was enforced in 2003 within the CFP framework, further sets out rules for EU

vessels, both in certain areas of the high seas of the North East Atlantic, the Arctic Ocean, and the EU exclusive economic zone (EEZ). This regulation has restricted fishing capacity and effort for EU vessels in certain deep sea fisheries and introduced the requirement for a special fishing licence for European vessels targeting certain deep sea species. The EU has also introduced quotas for certain deep sea fisheries. Yet, despite these rules and governance bodies, the destruction of deep sea habitats and the depletion of stocks and associated species have continued.

THE UN CALLS FOR AN END TO DEEP SEA DESTRUCTION, BUT WHO'S LISTENING?

In 2006, member states of the United Nations adopted a resolution agreeing that unless a series of protective measures were implemented in the high seas by 2008, deep sea bottom trawling should be stopped. ¹¹

This resolution has been largely disregarded, despite the United Nations General Assembly (UNGA) adopting a follow-up resolution calling to protect the deep seas from destructive fishing, in 2009.¹²

Even though some areas have been closed to trawling as a result of these resolutions, the truth is that weak implementation is allowing deep sea fleets to continue depleting deep sea stocks and damaging vulnerable marine ecosystems.

The Deep Sea Conservation Coalition (DSCC), of which Greenpeace is a founding member, has produced a thorough review of the implementation of the provisions, finding that deep sea fisheries continue to fail to meet their international obligations.¹³

Fishing states have failed to meet the requirements in these resolutions and have blocked the adoption of regional management measures aimed at increasing the protection of deep sea fish stocks and ecosystems. Many of these fisheries are not even subject to quotas or have not been scientifically

assessed, leading to the conclusion that deep sea fisheries for many species are effectively unregulated.

The UNGA began reviewing the implementation of the deep sea resolutions in September 2011. Negotiations between member states for implementing the resolutions will re-open in November, and it is crucial that they take the UN resolutions seriously.



OF THE EUROPEAN COMMON FISHERIES POLICY (CFP)

The EU is currently reforming the failed CFP.

The new CFP may be adopted by 2013, and will manage how, where and when the EU fleet can fish over the next ten years. If there is any chance to change the state of our oceans, the time is now. However, achieving a positive outcome in the final negotiation will require political will and determination to ensure that the short term financial interests of industrial-scale fishing fleets don't result in "business as usual". After all, there won't be any business if there's no fish left to catch.

EU Deep Sea Regulation - setting rules for the deep

An agreement on a new EU deep sea regulation is currently being formulated. Crucially, this will set fishing effort limits and impose gear restrictions and vessel licensing and monitoring rules for vessels targeting deep sea species in Europe. The International Council for the Exploration of the Sea (ICES) has recommended that there be an

immediate reduction of fishing pressure on fully exploited or overexploited deep sea stocks – for most species, ICES recommends a zero catch. It is vital that the EU's Fisheries Ministers and Parliament listen and adhere to this scientific advice and that they reduce fishing pressure on deep sea species and put in place a prohibition on destructive bottom trawling.



INVESTIGATING THE SUSPECTS: WHO`S DESTROYING THE DEEP SEAS IN EUROPE?

In the 60s and 70s, as a result of dwindling traditional stocks, Western European countries began expanding into deeper and deeper waters in the pursuit of fish. In the 1980s, the French, in particular, initiated major commercial deep sea operations – facilitated by a consumer market that was open to finding new species on their plates.¹⁵

The deep sea of the North Atlantic has the most heavily bottom-trawled high seas area in the world and is exploited mainly by the fishing fleets of the European Union. Three Member States make up 89% of the EU fleet's deep sea catches. Spain is responsible for 38% of catches, France for 31% and Portugal 20%. French and Spanish deep sea bottom

trawlers fish mainly in the North East Atlantic (NEAFC), and North West Atlantic (NAFO).

THE DEEP SEA FLEETS

THE FRENCH DEEP SEA FLEET

The French deep sea fleet represents only a very small part of the entire French fishing fleet. However, French deep sea trawlers are responsible for almost a third of European deep sea catches. There are 33 French vessels carrying special permits for deep sea fishing, 25 of which are bottom trawlers. These vessels catch more than 10 tonnes per year of deep sea species. However, only a dozen of these vessels specialise in catching deep sea fish (i.e. where deep sea species represent more than 10% of the value of the total catch).

The French bottom trawling deep sea fleet is active in several fishing grounds: mainly in the north-west of Scotland, at the edge of the continental shelf, in the south-eastern part of the Wyville Thomson ridge and between the Faroe Islands and Norway.

Three main companies are involved in deep sea bottom trawling:

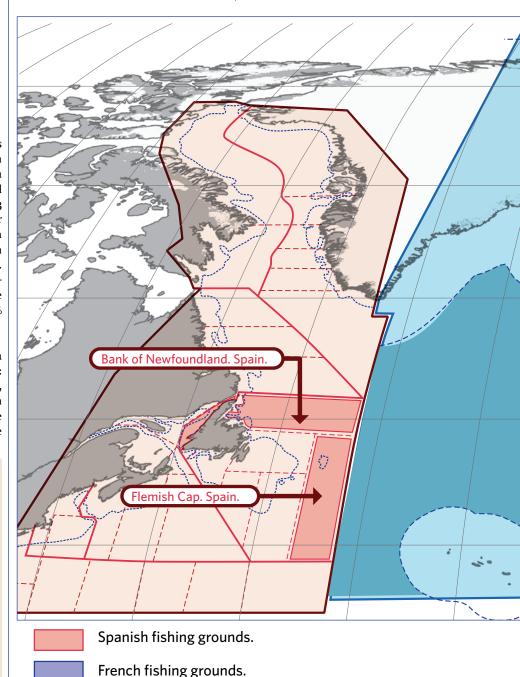
- Scapêche, the fleet owned by the French retailer Intermarché-Les mousquetaires, with seven vessels based in Lorient (Brittany).
- Euronor, with seven vessels based in Boulogne. Euronor was bought by UK Fisheries in January 2011. UK Fisheries is 50% owned by a daughter company of Parlevliet & Van Der Plas B.V, a Dutch member of the Pelagic Freezer-Trawler Association (PFA), one of the most powerful associations representing the industrial fishing sector in Europe.
- Dhellemmes, which also has direct links with the PFA, with five vessels based in Concarneau (Brittany).

THE SPANISH DEEP SEA FLEET

Spain maintains the largest, most powerful fishing fleet in the EU. Half of the Spanish industrial fleet – 1,277 vessels – are trawlers of various types and sizes.¹⁷

Of these, there are 107 deep sea bottom trawlers operating over a large area in the Atlantic: Northeast Atlantic (NEAFC), the Southwest Atlantic, Central-East Atlantic and Northwest Atlantic (NAFO).

Most of the Spanish deep sea boats that fish in the North East Atlantic are based in Galicia and the Basque country. Deep sea fish caught on the high seas represent 40% of the total value of NE Atlantic



NEAFC restricted areas.

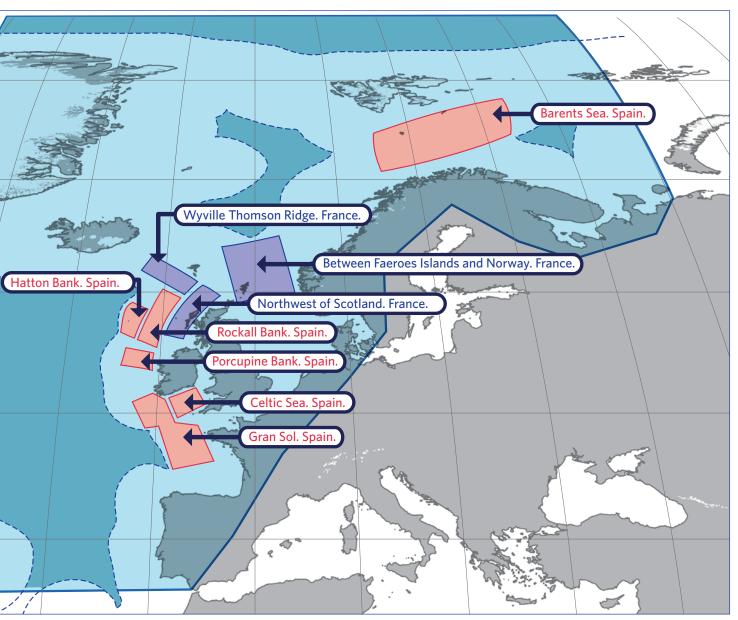
NAFO boundaries.

NEAFC boundaries

catches. 18 The deep sea vessels which fish in the North East Atlantic have their main home ports at Vigo, Cangas, Marín and Ondarroa.

The Spanish deep sea fleet that fishes in the North East Atlantic can be divided into three categories, depending on the length of the ship, the time spent at sea and the species targeted. One is the socalled "cod fishery". This fleet used to catch cod, until it became overfished, and now mainly targets deep sea species like halibut and redfish. This fishery is focused on the Flemish Cap, Bank of Newfoundland and the Barents Sea. Another part of the Spanish deep sea fishery is the "NAFO freezers" fleet that develops most of its activity in NAFO and NEAFC waters (Hatton Bank). Its main target species is halibut, as well as cod, haddock and monk fish. Both these

fleets spend months continually at sea, freezing the catch on board. The third part of the fleet fishes closer to shore, almost year round, targeting mainly hake, but also blue ling and monk fish, among other deep sea species. It mainly fishes in the NEAFC area, Gran Sol, the Celtic Sea, Porcupine Bank and Rockall Bank.



Boundaries of NAFO Subareas.

Divisions of NAFO Subareas.

Limits at 200 meters depth in the NAFO.

____ Limits at 200 nautical miles from the coast.

Infographics: Cristina Jardón/ www.graphicinside.es

SUNKEN SUBSIDIES HOW PUBLIC MONEY SUPPORTS UNSUSTAINABLE FISHERIES

The European Union directly subsidises its fisheries at a scale of 950 million euros a year.¹⁹

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European Commission, 2009, Green Paper on the Reform of the Common Fisheries Policy.

National-level subsidies are also provided – meaning that EU fisheries are propped up by at least 1.5 to 2 billion euros in direct annual subsidies. This is a conservative figure – the total sum is likely to be substantially higher.²⁰ Many indirect subsidies are also available and in 2009 the total amount of direct and indirect subsidies paid to European fisheries was around 3.3 billion euros.²¹

The same year, the European Commission, the main body administering European subsidies, warned that public financial support to fisheries often contradicts the objectives of fisheries management, and in particular the need to reduce overcapacity and achieve sustainable fisheries.²²

An analysis of the previous funding period for EU fisheries, from 2000 to 2006, showed that a large amount of subsidy payments (41%) had a negative environmental impact, such as those paid to deep sea bottom trawling. Only 9% were attributed to positive impacts.²³

The fact that deep sea bottom trawling is still continuing, reflects the destructiveness of the past and current EU subsidies policy under the CFP. Despite the

destructive nature of deep sea bottom trawling and the serious depletion of all deep sea stocks targeted by the EU, Member States, like France and Spain, have subsidised the construction and modernisation of their deep sea fleets with taxpayer money.

Deep sea bottom trawlers:

- consume large amounts of fuel in order to tow large, heavy nets at great depths through the water column and over rough seafloor terrain;
- have to travel further out and stay at sea for longer periods of time to reach suitable fishing grounds;
- catch large quantities of by-catch, from deep sea sharks to coral, sponges and other vulnerable marine life.

A study on deep sea bottom trawler fleets fishing in the high seas cites economic data which puts the profit achieved by such vessels at no more than 10% of landed value, despite the subsidies received.24

It is very difficult to track every payment of fishery subsidies at EU and national levels. Due to poor reporting by Member States and an obvious lack of transparency, the ultimate destination and purpose of a significant number of payments is simply unknown. In fact, only subsidy payments for vessel construction, modernisation, support for temporary joint ventures and vessel scrapping are linked to the names of individual vessels that have benefited from the payment.

Despite this, according to available data, Greenpeace has estimated that Spanish deep sea bottom trawling fleets have received at least €142 million in fifteen years, from 1996 to 2010.25 The subsidies we have been able to identify are very likely an underestimation of the real subsidies that have been funnelled into this sector. For instance, the calculation does not take in to account fuel tax exemptions for the fishing sector.

figures reveal that Spain and France subsidised their deep sea trawler fleets most heavily during the late 1990s and early 2000s. This mirrors global trends, which show that deep sea fisheries grew rapidly from the 1990s onwards.29 New vessels were constructed and older vessels modernised to suit deep sea fishing, ignoring warnings from scientists. In fact, in 1996 ICES recommended that "because of the vulnerable nature of the stocks [...] the precautionary principle should be adopted [... and] fishing effort should be kept at low level until sufficient information is gathered from existing fisheries to enable scientifically-based management decisions".30 It also warned that "significant proportions of the catch are discarded at sea". Yet, in the same year, at least 17 vessels were modernised in order to engage in deep sea fishing under Spanish and French flags. This high dependence on public aid is perhaps not surprising, given how ill-suited the technique of deep sea trawling is for catching a comparatively small quantity of edible fish.

Covering data from 1995 to 2007, the

These numbers mean that EU Member States, and primarily Spain and France, have subsidised a destructive and economically unviable fishing practice with taxpayer money, despite the fact that they were aware of the decline of deep sea species stocks. The governments of the EU have failed to manage fisheries for the future - but the reform of the CFP gives them an opportunity to do so.

FUEL TAX **EXEMPTIONS**

Deep sea bottom trawlers have the highest fuel consumption of all fishing vessels, as they need more power to drag the nets through the water and across the sea bed. More energy is needed to trawl the net at great depths (800-1400m) and to haul it from that distance. They also have to travel vast distances to reach fishing grounds. For example, the deep sea vessels targeting haddock and whiting use 0.44 kg of fuel per kg of fish caught.26

Given the very high fuel consumption of deep sea bottom trawlers, fuel costs are a decisive component of the overall operating cost.27 Consequently, fuel tax exemptions constitute a major indirect subsidy that significantly reduces the operating cost of the fleet.

A 2006 global review of subsidies paid to the high seas bottom trawler fleet presented figures for Spain and France, indicating respective fuel consumption rates of around 70 million litres and three million litres of fuel per year, respectively. Using information on fuel subsidies and tax exemptions, the paper calculated the sum of fuel subsidies for Spain and France to be around seven million USD and 400,000 USD, respectively. At current conversion rates, this would come to five million euros and 280,000 euros a year, respectively.28

THE PRICE OF FISH: DEEP SEADESTRUCTION FUNDED BY EU TAXPAYERS

Most of Europe's fishing fleets are either running at a loss or returning very low profits.

Overall poor performance is due to chronic overcapacity, of which overfishing is both a cause and a consequence: fleets have the power to fish much more than can safely be removed without jeopardizing the future productivity of stocks. This situation has arisen in a context of heavy public financial support given to the fishing industry, one of the results being to artificially maintain excess fishing capacity. This is particularly true for the deep sea bottom trawling industry. In several Member States, it has been estimated that the cost of fishing to public budgets exceeds the total value of the catches. In simple terms, this means that European citizens pay for their fish twice: once at the shop and once again through their taxes.

The operational activity of fishing has a direct cost for the company or vessel; the main costs are fuel (22-28%), salaries (21-25%), repairs (17-21%) and port expenses (12-13%).³¹ Other costs are foodstuffs, oil, fishing nets, social security, and travel arrangements for the crew. Of these expenses, fuel is subsidised through Minimis aids, and repairs are often subsided.

An average deep sea trawler that fishes in the North East Atlantic has total operating costs of €3,662,473 per fishing season.³² The catches of these vessels are almost completely paid for by taxpayers before reaching port.

For redfish, whose market price hovers around €22/kg, €4.40 has already been paid for by grants for trawler construction. This means EU taxpayers have already paid for 20% of its market price. If we buy ling, we will have already paid up to twice its price by way of construction subsidies that some trawlers have been granted.

Buying or selling a deep sea species has dire ecological consequences and perpetuates a deeply flawed subsidies policy that leads to overfishing and destructive practices.





WHO'S EATING FROM THE DEEP?

The main deep sea species sold in the Spanish and French supermarkets are American plaice, (Hippoglossoides platessoides), redfish ocean perch (Sebastes marinus), deep water red fish (Sebastes mentella), Atlantic and Greenland halibut (Hippoglossus hipoglossus and Reinhardtius hippoglossoidess), roundnose grenadier (Coryphaenoides rupestris), orange roughy (Hoplostethus atlanticus), black scabbard fish (Aphanopus carbo), ling (Molva molva), blue ling (Molva dypterygia) and deep sea sharks such as gulper shark (Centrophorus granulosus). All of these species are caught by deep sea trawling.

Deep sea fish species are distributed by supermarkets in fillet form, fresh or frozen. Normally the entire fish is never shown to the customer because it has been damaged by the high pressure inside the net, and due to the long fishing season, they are commonly processed onboard. Moreover, deep sea species have strange morphology, which can be considered as a marketing disadvantage.

Deep sea fish are also served in work places and school canteens. School canteens in France serve redfish, roundnose grenadier and blue ling from European waters.³³ Hoki is the main deep sea species served in school canteens, imported mainly from New Zealand and Patagonia. School canteens also serve threatened deep sea shark species, like picked dogfish (Squalus acanthias) and gulper shark (Centrophorus granulosus). Eating fish in a work place or school canteen, the consumer is unlikely to know what species they are eating, or be in a position to make a responsible choice. Even in supermarkets, consumers see only well-presented fish fillets, not the hidden destruction that has occurred before the fish lands on their plate, enabled by their own taxes.





SOURCE OF THE CRIME: WHERE DOES THAT FISH COME FROM?

The chain of custody

Deep sea fish destined for France are caught in deep waters northwest of Scotland and west of Ireland. They are then landed in Lochinver (Scotland) or in Killybegs (Ireland). As soon as they come off the boat, the fish are loaded onto lorries and sent to France (Boulogne and Lorient). Here the fish are processed in marketable fillets. Thirty-six hours elapse

YOU MAY BE EATING THREATENED SHARKS WITHOUT KNOWING IT: THE CASE OF THE GULPER SHARK

The gulper shark (*Centrophorus granulosus*) is a common large, deep water dogfish living in the outer continental shelf and its upper slopes, usually between 200 and 600m deep, although sometimes as deep as 1,440m. Gulper sharks can live for up to 30 years, with females only reaching maturity at 12 to 16 years of age. Gulper sharks reproduce extremely slowly pregnancy lasts two years, with resting periods in between, and often only one pup is produced.

These characteristics make them extremely vulnerable to overexploitation and population depletion. According to the IUCN, this species is globally assessed as vulnerable on the basis of its limiting life history traits and the global increase of fishing effort in deep sea waters. In the NE Atlantic the picture is worse, with an estimated population decline of 80 to 95%. In this area, the species is assessed as critically endangered.³⁴

Despite the fact that the gulper shark is a threatened species, they are still found on the market. This fish is often served to children in school canteens in France, as well as other threatened deep sea shark species such as picked dogfish. More broadly, problems exist in the identification of shark species; for instance, in France, "saumonette" can refer to several different shark species, including deep sea sharks such as the gulper shark.

between the fish being caught and the fish being processed.

The chain of custody in Spain is more difficult to follow. This country imports some deep sea species caught by ships flagged to countries other than Spain, but operated by Spanish companies and landed in Spanish and non Spanish ports.

Most of the catches from the north Atlantic trawler fleet are landed directly by fishing vessels in the Vigo area (including the Port of Marin). Fish are processed (gutted, etc.) and frozen on board.





RESPONSIBLE RETAILING CAN HELP FOSTER SUSTAINABLE FISHERIES

Consumers and retailers have the power to improve the sustainability of fisheries. By choosing which fish to buy and sell, they can provide a clear message directly to the operators and advocate for sustainable fish. To do that, they need to know more about the fish that is on their plates and or their shelves.

With growing consumer demand for sustainable seafood, progressive market players increasingly refuse to sell deep sea species. Greenpeace has worked with retailers for seven years, calling on them to stop sourcing seafood from unsustainable fisheries, including deep sea fisheries that target highly vulnerable species, use destructive fishing methods, impact vulnerable ecosystems and/or generate large amounts of bycatch. In several countries, Greenpeace has produced "red lists" adapted to the national market and consumer habits to inform retailers and consumers of the negative impacts of certain fisheries. Greenpeace France³⁵ (in 2011) and Greenpeace Spain³⁶

(in 2008) have established red lists and asked retailers to stop sourcing deep sea species.

In Spain and France, some responsible retailers have stopped selling certain deep sea species because of their threatened situation. For example, in Spain, Alcampo (Auchan Group) has stopped selling American plaice, redfish and threatened sharks (2009).³⁷ El Corte Inglés no longer sells redfish (2010).³⁸ And Lidl's supplier policy ensures that it does not stock any threatened deep sea species caught by bottom trawling (2010).³⁹ In France, Casino no longer sells orange roughy, blue ling

or picked dogfish.⁴⁰ Leclerc has stopped selling white halibut, blue ling and gulper shark,⁴¹ and Carrefour doesn't sell orange roughy or blue ling.⁴² However, all retailers continue to sell at least one deep sea species.

RETAILER INTERMARCHÉ RESPONSIBLE FOR DEEP SEA PLUNDER

One retailer in France is highly responsible for destroying the deep ocean. Intermarché is the only retailer that actually owns its own dedicated deep sea fleet and is responsible for more than half of the French deep sea catches.

Intermarché also has its own facilities to transform the deep sea fish into fillets. It has made the strategic choice to build its fish supply on deep sea bottom trawling, one of the most destructive fishing practices. Intermarché's fleet received

€9.7 million of taxpayer money between 1996 and 2008.⁴³ This money has helped Intermarchés's vessels to continue to destroy the deep sea by fishing roundnose grenadier, blue ling and black scabbard.

DEEP SEA BOTTOM TRAWLING: IS IT WORTH IT?

Deep sea bottom trawling does not make sense economically or environmentally.

The Spanish deep sea bottom trawling fleet caught a total of 686,137 tonnes in the high seas between 1993 and 2006. This catch was made up mainly of Greenland halibut, roundnose grenadier and cephalopods. Most of these species are not consumed in Spain, but are exported to other markets. The main exports are Portugal (18553,8 t), China (10284,2 t) and Italy (8.518,8 t).⁴⁴ Other countries like France, Germany and the Netherlands also import this product from Spain.

France landed 7,300 tonnes of deep sea fish in 2008, most of it consumed within the country. In 2009, France imported 17,912 tonnes of deep sea fish; over a quarter of it was Hoki from New Zealand. Together, these figures represent only 1% of the seafood consumed annually in France. Each year, on average, every French person eats 0.4 kg of deep sea fish, compared to 2.5 kg of fresh salmon.

The deep sea fishery does not make sense environmentally or economically. For the EU as a whole, landings of deep sea species made up only 1.5% of landings of all species by volume, and only 0.25% by value of the total of landings into EU ports between 2004 and 2006.⁴⁸ Deep sea bottom trawlers are destroying rare and unknown ecosystems, decimating vulnerable species and costing the tax payer through subsidies, all for a fishery that isn't crucial for food supply and has little economic significance.

FRENCH FISHERMEN

The French fishing fleet is diversified, both in terms of species caught and fishing practices. However, the small scale sector is more representative than the industrial sector, representing 82% of the French fishing fleet. Three hundred and fifty-five French ships are involved in the industrial sector, with 241 vessels over 24 metres in length. ⁴⁹ In comparison, 3,449 vessels (71% of the French fleet) are under 10 metres in length. ⁵⁰



DEEP SEA BOTTOM TRAWLING IS NOT REPRESENTATIVE OF FRENCH OR SPANISH FISHING SECTORS

Spain and France have a great fishing tradition all along the coast, with areas that are highly dependent on traditional fisheries, both directly and indirectly, in terms of economic and social activity in the fishery.

The small scale sector directly employs 8,299 people, or 51% of French fishermen.⁵¹ In comparison, French deep sea bottom trawlers directly employ only around 150 people at sea.⁵² Greenpeace has assessed the number of at-sea and land-based jobs generated by deep sea trawling at approximately 258 full time jobs. This includes transportation, processing and packaging roles. Given the total number of fishermen in France, this fishery is not an important job supplier. Combining direct and indirect employment, it represents only 1% of jobs in the French fishing sector.

SPANISH FISHERMEN

According to European employment statistics, Spain is the country with the most jobs generated in the fisheries sector, with a total of 47,500 direct jobs onboard and onshore.⁵³ From 2003 to 2009, employment in the Spanish fisheries sector dropped by 39%.

Spanish deep sea bottom trawling in the North Atlantic employs 2,261 people onboard the ships. However, the 2,261 at-sea jobs represent only 5.94% of total onboard employment in the Spanish fishing sector. In comparison, the Spanish artisanal fleet (under 12 metres in length) represents 28.35% of employment at sea, and almost 80% of the Spanish fishing fleet.⁵⁴

THE NEED TO SHIFT TOWARD A SUSTAINABLE FISHING MODEL TO SAVE OUR SEAS

The term "artisanal fisheries" applies in particular to coastal or island fisheries that have a fishing pattern of one day and where the owner of the ship and the employers are the same. Artisanal fleets are small boats that do not travel very far from land and fish for less than 24 hours in a row.55 They are very versatile, using traditional techniques interchangeably, such as traps, hand lines, nets and small long lines. Therefore, the catches made by these boats can be very diverse: fish, cephalopods or crustaceans. The number of catch per boat is small, but of high economic value because they target species of high demand in the domestic market. Selective fishing methods produce quality products, such as using hook gear on species like hake and sea bream, and traps in the capture of cephalopods, octopus, squid and cuttlefish. In comparison, industrial methods such as trawling damage the fish – which are sometimes brought on deck separated from their skins, due to the crushing and chafing effect of the nets.

Spanish artisanal fishermen and fisherwomen are now creating their own organisations to reclaim their rights and support artisanal fisheries. In the Mediterranean, the artisanal fishers have joined with Italian and Greek fishers to demand a better reform of the CFP, which must take artisanal fisheries into account. Artisanal fishers have also been involved in the creation of Marine Reserves, such as the "Os Miñarzos" in Galicia where the artisanal fishers have jointly protected an area of 2,000 ha. They are involved in the co-management of the area and promote artisanal fisheries.

"BY 2020, 60% OF

SPANISH ARTISANAL

FISHERMEN ARE GOING

TO DISAPPEAR AND 45%

HAVE ALREADY BEEN

LOST IN CATALUÑA IN

THE LAST 10 YEARS."

Ramón Tarridas, representative for the artisanal fishermen of the



TESTIMONIES OF ARTISANAL FISHERMEN

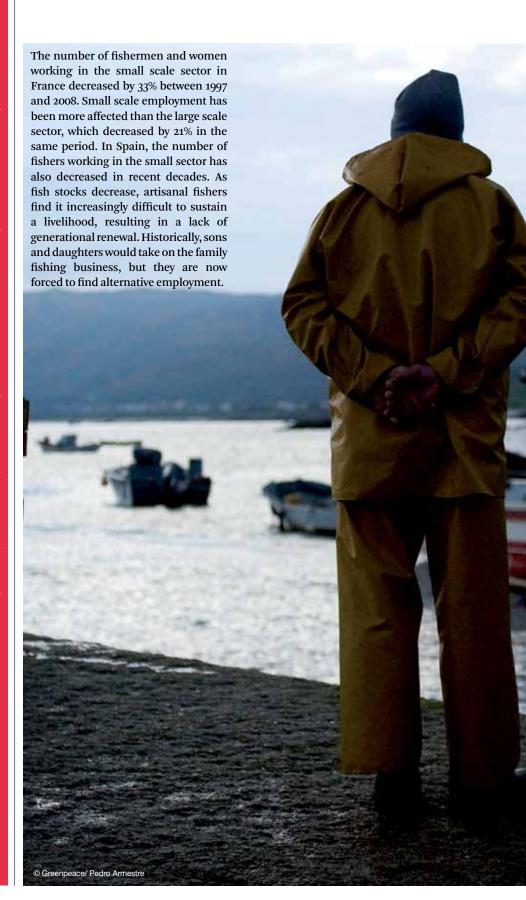
"Other types of fleets receive subsidies; even aquaculture gets public money. Why not traditional fishing? It is more sustainable, it's good for the community at large, and it creates more employment." He continues, "The debate in Europe about the reform of the Common Fisheries Policy should serve to emphasise the need to recognise the value of traditional fishing, because it's more sustainable than any other type of fishing from any other fleet. Fishing fleets practising selective fishing should be rewarded. I'm not talking about subsidies, I'm talking about being seen as a value."

Emilio Louro from Spain

"To me, small-boat fishing holds a continued passion to pursue a sustainable business. I have long felt how Man's increasing demand to obtain food from our seas has long since surpassed realistic levels. From the mid-1970s onward, the Cornish fishing industry saw major changes. Having witnessed that 'technical creep', I feel safe to describe it as an industrial revolution. Advances in fishing gear technology, buying more efficient and higher powered boats were common place. With marine electronics advancing equally fast and revealing much of the movements of fish and shellfish, the end result is what we have today.

Artisanal fishing is by its nature the core of many small, remote communities, those within which its infrastructure relies upon fishing. Although small in population, without fishing those communities would be dysfunctional."

Phil Lockley, hand liner from Cornwall, UK



GREENPEACE DEMANDS

A SUSTAINABLE COMMON FISHERIES **POLICY REFORM**



Greenpeace calls on the EU Member States and the European Parliament to reform the Common Fisheries Policy, in order to:

- · Reduce overcapacity, by first decommissioning vessels that are the most destructive to habitats and stocks, and eliminating wasteful fishing practices such as deep sea bottom trawling
- · Shift from environmentally harmful fishing practices to sustainable, lowimpact fisheries that provide for an equitable distribution of marine resources and the availability of food supplies now and in future
- Reform the subsidies policy so as to end harmful subsidies, prohibit the support of measures that enhance fishing capacity; and ensure investments in restoring and maintaining stocks and the health of marine ecosystems
- · Set quotas in accordance with scientific advice and ensure the recovery of fish populations beyond levels that can support the maximum sustainable yield by 2015

In the context of international agreements and the EU's commitments to achieving sustainable fisheries, we further call for an immediate end to deep sea bottom trawling, except where protective measures are in force and have been effectively and fully implemented.

REFERENCES

- Maria Damanaki, Breaking the circle: introducing a new Common Fisheries Policy (13 July 2010) p.2 http://ec.europa.eu/commission_2010-2014/damanaki/headlir speeches/2011/07/20110713-speech-cfpreform_en.pdf
- Communication from the Commission Concerning A Consultation On Fishing Opportunities, (25 May 2011) p.2 http://ec.europa.eu/fisheries/partners/consultations/ shing_opportunities/consultation_document_en.pdf forms and al., Impacts of Biodiversity Loss on Ocean Ecosystem Services, in Science,
- Vol. 314 no. 5800 pp. 787-790, November 2006 European Commission, Green Paper-Reform of the Common Fisheries Policy, April 2009
- DSCC website: http://www.savethehighseas.org/whatsbeendone/#1 and http://www.savethehighseas.org/whatsbeendone/#1 and http://www.savethehighseas.org/news/view.cfm?10=242
 Elliot A. Norse et al. Sustainability of deep sea fisheries. Marine Policy36(2012)307–320.
- Sumaila U, Khan A, Teh L, Watson R, Tyedemers P, Pauly D, Subsidies to high seas bottom trawl fleets and the sustainability of deep sea demersal fish stocks, Marine Policy 34 (2010) 495-497
- ethehiahseas.ora/
- EC 2007. http://ec.europa.eu/fisheries/documentation/magazine/mag34_es.pdf http://www.eu-hermione.net/
- 9. http://www.eu-hermione.net/
 10. ICSE (2008), Indicator status of fish stocks managed by the Community in the North-East Atlantic., ICES Advice 2008, Book 1; 1.5.1.1.
 10th http://www.mcbi.org/what/what_pdfs/dscs_signatures.pdf
 11. UN General Assembly Resolution 61/105.
 12. UN General Assembly Resolution 61/105.

- UN General Assembly Resolution 64/72.
 Unfinished business a review of the implementation of the provisions of United Nations General Assembly resolutions 61/105 and 64/72, related to the management of bottom fisheries in areas beyond national jurisdiction. DSCC, September 2011, http://www. sawethehighseas.org/publicidoss/DSCC_review11.pdf
 http://www.icss.dk/products/icesadvice/2010/ICES%/20ADVICE%/202010%20 Book%/206.pdf
 Gordon, J.D., O.A Bergstad, I. Fegueiredo and G. Menezes. 2003 Deep-water Fisheries of the Northeast Atlantic: I. Description and Current Trends. J. Northwest Atl. Fish. Sci., 31: 137-150

- di tie Notifiesa-Nation Le. Description air Current Heritas. J. Notifiesa-Nation 181: 50-1.

 di 181: 1817-191.

 18. http://www.pewenvironment.org/campaigns/protecting-the-deep sea/id/5589940401

 17. Greenpeace made calculations based on all the trawlers in Spain, and data was obtained from http://iec.europa.eu/fisheries/fleet/in/dex.cfm

 18. Deep Sea Conservation Coalition. 2005. Protejamos al mar profundo de la pesca de arrastre. http://www.dar.org.pe/pdfs/pesca_de_arrastre.pdf

 19. The lons's share of this funding comes from a dedicated fund, the European Fisheries Fund (ca. 620 million/year). Other sources include a pot of public money used to secure access to the waters of non-EU countries and to pay for participation in international meetings (300 million/year) and funds earmarked to support the marketing of products under the so-called European Apricultural Guarantee Fund (around 30 million/year).

 20. The total sums of national suisidy payments to the febring sector in the EU are not recorded consistently, making it impossible to evaluate total direct subsidy payments. There are a number of different schemes under which money is paid, of which the most important are.) Imoney allocated to co-finance projects run under the European Fisheries Fund (EFF); ii) state aid payments, iii) national de minimis aid, which comprises small amounts of direct payments to frisere payments to direct payments to fisher payments and by payments under so-called block small amounts of direct payments to fishermen; and iv) payments under so-ca sale alramonation directly explicates in statements, and my performance labels or example to exemptions. National co-financing under the EFF amounts to around 40% of the total money spent, i.e. around 420 million euros per year. For the above calculation, staid aid payments are assumed to be in the range of 200 million euros per year. Other payments are too difficult to determine.
- are too difficult to determine.

 2.1 Oesana (2009) The European Union and Fishing Subsidiles http://eu.cosana.org/en/eu/media-reports/publications/the-european-union-and-fishing-subsidies

 22. European Commission, 2009, Green Paper or the Reform of the Common Fisheries Publicy Intity-feur-lex.europea.eu/Lext/ISFev/Lext/ISFev.dor/ari=COIM-2009-0163-RNEN-PDF

 3. Cappell, R., T. Hurtington and G. Maccladyen (2010) FIFG 2000-2006 Shadow Evaluation. Report to the Pew Environment Group.

 3. Sumaila, U. R., Khan, A. et al. (2010) Subsidies to high seas bottom trawf fleets and the sustainability of deep sea demersal fish stocks. Marine Policy 34(3): 495-497.

 25. This calculation bas been anafe by consensor data contained in the fishs shicky on

- This calculation has been made by crossing data contained in the fishsubsidy.org database and the Spanish Official Bulletin (Boletin Oficial del Estado) where some of the allocated subsidies are published. allocated subsidies are published.

 Oceana. (2010). Impacts of Bottom Trawling on Fisheries, Tourism, and the Marine
- MRAG, MG Otero & PolEM (2008) Analysis of the economic and social importance of Community fishing fleet using bottom gears in the high seas. London: MRAG Ltd. 250
- pages.

 S. Sumaila, U.R., Khan, A., Teh, L., Watson, R., Tyedmers, P., Pauly, D. 2006

 MRAG, Mic Otero & PolEM (2008) Analysis of the economic and social importance of Community fishing fleet using bottom gears in the high seas. London: MRAG Ltd. 250 pages.

 3. Report of the ICES Advisory Committee on Fishery Management, 1996. 1997. http://www.ices.dk/pubs/cr/cr/cr21/CRR221-2.pdf

 31. Calculations made by Greenpeace.

 22. Calculations made by Greenpeace, taking into account an average trawler that fishes in NAFO and NEAFC.

 33. Bloom association. (2011). Le poisson dans la restauration scolaire. Nos enfants monant-lis des espèces menacées?

- mangent-lis des espèces menacées ?.

 34. http://www.iucnredlist.org/apps/redlist/details/39325/0
 http://www.fishbase.org/Summary/SpeciesSummary.php?ID=648&AT=gulper+shark
- 35. http://www.greenpeace.org/france/PageFiles/300718/guide-greenpeace-poissons.pdf
- http://www.greenpeace.org/espana/es/frabajamos-en/Defensa-de-los-oceanos/ Consumo-y-supermercados/Lista-Roja-de-Especies-Pesqueras/
- Consumo-y-supermercators/usta-Hojo-de-Especies-Yesqueras/
 3. Alcampo y Sabeco cessa I a comercialización de thurones en peligro de extinción:
 http://www.alcampo.es/detalle-noticias?p_p_auth=IPGw05rW&p_p_id=568p_p_
 ifiesyde=08p_p_mde=view&p_p_col_id=column=28p_p_col_igo=278p_p_col_
 count=98_6 5g_roupid=10168_6 5a_articide=255978_6 5_eversion=1.0

 38. El Corte Inglés. Informe Anual de RSE 2010, (Page26): http://www.
- el corte ingles corporativo. es/el corte ingles corporativo/el corte ingles corporativo/portal. do? TR=A&IDR=1& identificador=1017
- LILD 2010, April. Internal communication with Greenpeace Spain
- Greenpeace received an internal communication in 2007 Press release of the 18th February 2010
- 42. Greenpeace received an internal communication in 2008.
- 43. Bloom Association, Profil écologique et socio économique des pêches profondes, mai

- 44. Eurostat 2010
 45. Rapport final de la mission pêche profonde, Environment ministry, September 2010
 46. Franceagnimer, Commerce extérieur de la filière pêche-acquaculture, 2009
 47. Franceagnimer, Consommation des produits de la pêche et de l'aquaculture. Données statistiques 2010
 48. MRAG, Otero, MG and Pol,EM, (2009), Analysis of the economic and social importanc Community fishing fleet using bottom gears in the high seas. London, 250 pages.
 49. DPMA (2009), French fishery administration.
 50. French fishery administration DPMA, 2009
 51. France Acriner 2018 (excluding ultranerinterior areas)
- France Agrimer 2008 (excluding ultraperipheric areas)
- "Mission péche profonde" report, 2010, and data collected during Greenpeace campaign at sea in North East Atlantic (March and April 2011) 84 (Scapēche) + 40 (euroorp pour les deux navires specialistes) + 24 Dhellemmes (data recorded during the first ship tour-march 2011)
- Eurostat. (2008). http://epp.eurostat.ec.europa.eu/portal/page/portal/eurostat/home Greenpeace has calculated this number as the people employed in ships of sizes 12 metres or less. Artisanal fisheries in Spain are not restricted to this vessel size, but the
- statistics for bigger sizes include coastal trawlers, as they are considered a damaged fisheries net that is not artisanal. That's why only ships under 12 metres have been
- French fishery administration -DPMA, 2009
- El Pais, (18/08/2011), Otra pesca es posible. http://www.elpais.com/articulo/sociedad/ pesca/posible/elpepusoc/20110815elpepusoc_2/Tes

