

Mr. Karmenu Vella
Commissioner for Environment, Maritime Affairs and Fisheries
European Commission

Brussels, 05 March 2018

Subject: Technical and conservation measures regulation's proposal as modified undermines nature and fisheries policies and should be withdrawn

Dear Commissioner Vella,

In March 2018, the European Commission will enter in trialogue negotiations with the European Parliament and the Council of the European Union to agree on the regulation to conserve the marine environment through fisheries technical measures (COM(2016)0134). However, the state of play, in particular the position adopted by the Council in May 2017 and the European Parliament in January 2018 would dangerously undermine existing environmental standards and the objectives of the Common Fisheries Policy (CFP).

In March 2016, the European Commission proposed a regulation in an effort to conserve the marine environment through fisheries technical. In the last 2 years, we actively engaged in improving the Commission's proposal, including in a constructive and merit-based dialogue with your services. Nonetheless, Members of the European Parliament and the Council have decided to delete some crucial provisions and failed to introduce necessary measures that would have ensured coherence with other existing environmental laws. For example, mitigation measures for sea turtles that are protected under EU law are completely missing, as well as having meaningful and necessary targets to reduce unwanted catches of juvenile fish. These, amongst others, are fundamental to be able to achieve concrete results in terms of conservation of the marine environment through technical conservation measures.

Birdlife Europe, ClientEarth, Oceana, Seas At Risk and WWF would like to highlight the serious concerns regarding the state of play of this legislation and that negotiations with the Council and Parliament are futile since both approaches would have serious negative impacts for our marine environment and the future of both fish populations and local communities.

We believe that it is the obligation of the European Commission, as guardian of the EU law, to avoid regression in the implementation of the CFP and to ensure that EU environmental legislation is not being undermined but rather fully implemented. We would therefore request the European Commission to withdraw the proposal.

We are aware of the challenge of taking this difficult decision, however we believe that the Commission must avoid the adoption of a regulation which potentially brings more damage than benefit to our marine environment, fish population and in consequence to our fishers and local communities.

Yours sincerely,



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