

**Att. Karmenu Vella
Commissioner of Maritime Affairs and Fisheries
European Commission, MARE-J99-II**

Madrid, 16 May 2018

Subject: Improving EU actions for International Fisheries Governance in the Atlantic and Indian Oceans

Dear Commissioner Vella,

The LDAC is concerned that the EU is not appropriately involved in the Atlantic and Indian Oceans when it comes to promoting good governance and sustainable fisheries development. This has detrimental impacts both for the sustainable EU fleets activities, as well as for our partner countries sustainable fisheries development. For example, the EU agreed to catch and/or fishing effort limits for its fleet, whilst such limits have not been implemented to other fishing fleets from IOTC and ICCAT Contracting and Cooperating Non-Contracting parties. Therefore, efforts consented by the EU have not resulted in increased sustainability, neither in opportunities for coastal countries to develop sustainable fisheries value chains.

We raised those concerns at a recent meeting that we had with you and your cabinet at the DG MARE, in which we agreed about the key role the EU should play to improve International Fisheries Governance. However, we must regret that the commitment expressed has not concretised despite several requests coming from the LDAC.

The last example where DG MARE has lost an excellent opportunity at Regional level to promote the Implementation of the FAO Port State Measures Agreement in the Atlantic, has been the meeting organized by ATLAFCO about this subject (Rabat, Morocco, 12-13 March 2018).

The LDAC would like to welcome the work made by ATLAFCO Secretariat coordinating the 3 sub-regional fisheries bodies in the Atlantic rim of Africa. All the 3 sub-regional organizations (CSRP, COREP and CPCO) were about to sign and adopt a MoU for what could have been a Regional Action Plan for the PSMA implementation, but the lack of support from the major donors present at the meeting, in particular the absence of the EU, ended up with an unprecise way forward, due in large part to the absence of the EU delegation, and henceforth the lack of clarity regarding its potential support and the extent of this support for ATLAFCO on this topic.

We believe that a great opportunity for the EU to show support, and to take a key role towards the improvement of MCS in the Western Atlantic Ocean region has been missed. Considering that the EU has signed SFPAs with many ATLAFCO Members; that it is leading the work on the fight against IUU in RFMOs; that it has strong commercial and development linkages with most of the ATLAFCO members, we consider that the EU should take its responsibilities as a flag state, as a market state and as a development partner to ATLAFCO members under the Cotonou Agreement, to support the implementation of regional MCS programmes and initiatives. In view of this, we would like to request that the EU considers support ATLAFCO-COMHAFAT in the implementation of the PSMA and other regional programmes (Observers, VMS...) in the Western Atlantic Ocean.

For your information, the EU purse seine tropical tuna fleet represented at the LDAC has already indicated its willingness to participate in any pilot project implemented by the ATLAFCO, specially referred on a Regional Port Inspection and Observer Programme that could be easily launched with targeted institutional help of the European Commission. You can find annexed the following documents:

1. Statement made by the LDAC delegates at the Rabat workshop.
2. ATLAFCO Study on a regional fisheries observer programme at sea (Dec. 2016).
3. ATLAFCO Study on a harmonised inspection programme at ports (January 2018).

All the LDAC members hope that your commitment in promoting International Ocean Governance will concretise through the collaboration with ATLAFCO to improve Fisheries Governance in the Atlantic Ocean. We firmly believe, that is a unique opportunity that may be replicated in the Indian Ocean through the Indian Ocean Commission and the new project that the European Commission is preparing for that region.

Yours faithfully,



P.R. Iván López
LDAC Chairman

**ANNEX I. LDAC STATEMENT ON COMHAFAT WORKSHOP FOR VALIDATION OF A REGIONAL HARMONISED PROGRAMME FOR PROCEDURE FOR PORT INSPECTIONS
RABAT, 13 MARCH 2018**

The LDAC is committed to assist its partner ATLAFCO-COMHAFAT in facilitating the dialogue with the European Commission, particularly DG MARE and DG DEVCO, in order to seek administrative and technical support for the implementation of the FAO PSMA to prevent, deter and eliminate the illegal, unreported and unregulated fishing (IUU).

In this context, the LDAC supports the study presented to develop a regional harmonised programme for port inspections and believes that might be a cost-effective channel to comply with minimum standards of control procedures thorough the 22 countries of the Atlantic African region. However, the LDAC believes that political will and responsibility from all MS of the COMHAFAT region to cooperate is indispensable and essential for the success of this initiative, bearing in mind the capacities and realities of each country.

A multi annual action plan with a clear timeframe and deliverables for the completion of this programme should be set in place building on existing projects and initiatives developed by African sub-regional fisheries organisations in the area (CSRP, FCWC, COREPER) and RFMOs (such as ICCAT and IOTC).

The LDAC believes that harmonisation of national legislations, capacity building for MCS and participatory governance are three key areas for development. The LDAC thinks that it is essential to make use of existing available resources and projects on areas such as inter-agency cooperation, harmonisation of control procedures, formation and training of inspectors, and risk based assessment methodologies for port inspections. In this area, the European Fisheries Control Agency (EFCA) could be a valuable player and contribute to this process through a wider role on the international dimension of the CFP and progressing through ongoing projects such as FISHGOV (AU-IBAR and NEPAD) or PESCAO Project for the Gulf of Guinea.

The LDAC members of the EU purse seine industry (Spain and France) are willing to share the experience they have acquired through the implementation of Port State Measures and procedures in other oceans, as it is the case with the Indian Ocean, where the IOTC has implemented an e-PSM Tool and facilitated capacity building of Port Authorities staff in IOTC CPC that are Port States. In this context, the EU purse seine industry indicated its willingness to participate in the harmonisation and consolidation of the pilots currently ongoing and the implementation of a full scale pilot through the COMHAFAT in the future.

The LDAC notes that the GEF Common Oceans ABNJ Tuna Project, executed by the FAO, has a component intended to improve tuna-RFMO compliance, through better MCS, and suggests that COMHAFAT explore possible funding avenues for the Pilot, to be included in Phase II of the ABNJ Project.

The LDAC is on the course of preparing an advice asking the European Commission to make an assessment of all existing EU funded projects to enhance EU policy coherence for development in fisheries governance to optimise its use in line with the objectives of UN SDGs and help to the sustainability of fisheries.

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Yours faithfully,

Iván López
LDAC Chairman