

CAPE

*Coalition pour
des Accords de Pêche Équitables*



*Association pour la Promotion
Et la Responsabilisation des
Acteurs de la Pêche Artisanale
De Mbour*

The 11 March 2014

TRANSLATION – original sent in French

Dear Mr Cesari,

On behalf of CFFA and its Senegalese partner APRAPAM, that published in November 2013 the Memorandum of the artisanal fishing sector stakeholders about the content of a potential future sustainable fisheries partnership agreement between Senegal and the EU¹, we are writing to you about the on-going negotiations.

We have concerns that these negotiations would not respect the new reformed CFP principle of fishing only at sustainable levels third countries resources. In the case of the negotiations with Senegal, we are concerned about the fact that fishing possibilities could be negotiated for hake.

Since the termination of the Protocol annexed to the Fisheries Agreement in June 2006, hake has no longer been a targeted species. It is only caught as by-catch of shrimp trawlers. Both hake species, stocks of which are not easily distinguished and hence evaluated as a unique stock, are deep species mostly present on the continental shelf between 100 and 500 meters north of Senegal, but mostly in Mauritania.

According to the ex-ante evaluation study conducted by Cofrepêche for the European Commission and released in November 2013, «the potential for a future agreement with the EU to include authorizations for fishing for hake (a deep water demersal species) in Senegalese waters is uncertain as no ‘biological and financial feasibility study’ has taken place to confirm the viable total allowable catch level. The catch potential would be low according to the evaluations carried out in 2008 by the CRODT and according to a DPM Project concerning a management plan for the hake fishery formulated in 2010’.

Further more recent and reliable scientific evaluations analyzing the catch potential and state of the hake stock differ in their conclusions:

- According to the last CECAF sub-committee evaluation of 2012, the stock is not overexploited;
- In the report of the June 2013 Senegal Inter-Ministerial Committee on Fisheries, CRODT recommends that fishing effort should be frozen at its actual level for hake stocks, for which over- or full exploitation signs are detected.

¹ Memorandum of the artisanal fishing sector stakeholders, November 2013
<http://www.aprapam.org/wp-content/uploads/2013/11/memorandumsenegal-anglais1.pdf>

The ex-ante evaluation study makes it clear that a more in depth analysis is required to be able to decide on the catch potential and the status of hake stock. This analysis is foreseen in the framework of the deep shrimp management plan.

Our organisations feel that in such situation, the precautionary approach has to be followed. Until an in depth study on the status of the stock, and the potential impacts of increased exploitation has been completed, and that precautionary reference points are established which ensure that the stock can be restored and maintained well above a level of abundance which can produce MSY in the long-term, no fishing opportunities should be allocated to EU vessels.

Our organisations would like to make the following recommendations, in line with the provisions in the reformed CFP:

- 1) The EU needs the most recent and reliable scientific data to justify looking at fishing possibilities on hake under this agreement. Given the info currently available on the hake stock concerned, the EU needs to wait for the results of the ADUPES project report, funded by the EU, to be completed and made publically available;
- 2) This is a shared stock so a concerted approach with Mauritania, - which is exploiting this resource-, must be taken for the management of that fishery. It's important to carefully study the environmental and socio economic impacts of such operations on resources and fleets from Senegal and Mauritania
- 3) If reliable scientific data reveals that that there is a possibility to exploit this resource while restoring and maintaining the stock at a level of abundance well above that capable of producing MSY in the long term, and in case Senegal would decide to allocate some access to EU vessels, such vessels should only use selective and non-destructive fishing gears to avoid high levels of by catches and environmental destruction, as is generally the case with trawlers. Appropriate means of control and surveillance of these vessels should be put in place.
- 4) As for any other fishing operations taking place under an SFPA, regular monitoring of these operations, and whether they respect the terms of the agreement, should be in place. Stakeholders from all involved parties should be informed about the results of this monitoring, and consulted about potential corrective measures taken.

Yours sincerely,

Association pour la Promotion
et la Responsabilisation
des Acteurs de la Pêche
Artisanale à MBour
Gaoussou Gueye
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