

European Anglers Alliance, EAA  
European Fishing Tackle Trade Association, EFTTA  
Rue de la loi 81a  
1000 Brussels  
Belgium



Tel: +32 (0)2 725 11 15 • Email: [info@eaa-europe.eu](mailto:info@eaa-europe.eu) • Web: [www.eaa-europe.eu](http://www.eaa-europe.eu) • [www.eftta.com](http://www.eftta.com)  
EAA Transparency Register number: 60105502183-69  
EFTTA Transparency Register number: 08955462188-48

---

Brussels, 20 January 2020

## **The ongoing revision of the EU Fisheries Control System - EAA and EFTTA position on the recreational fisheries provisions**

### **The European Parliament starts all over again**

Last year (30 May), the European Commission published a proposal for a revision of the [EU's fisheries control system](#). The European Parliament's Committee on Fisheries since then worked on amendments to the Commission's proposal. But elections last summer put a halt to that work. The new European Parliament's Committee on Fisheries decided to start all over again.

[Ms Clara Aguilera](#), an experienced Spanish MEP from the Socialist group, was appointed as the new rapporteur for this file.

**The Commission's proposal** brings many suggested changes to improve the system. The changes concern commercial as well as recreational fisheries. EAA and EFTTA welcome many of the proposed changes, others not. Here we focus on provisions proposed for recreational fisheries alone. **However, having said that** EAA and EFTTA would find it highly **inappropriate and unfair** should the final text lead to less control of small-scale commercial fisheries compared with the control of recreational fisheries.

### **Article 55 - 'Recreational fisheries'**

**A compulsory registration or licensing system** is proposed, which would improve figures on the number of people engaged in recreational fishing at present and over time (trend figures). The registration of individual recreational fishers also would make it easier to collect other relevant data on recreational fisheries.

**EAA and EFTTA stress** the importance of the free choice given to Member States between a registration or a license system. In some EU Member States an obligatory registration or licensing system is already in place. Some schemes include a fee to be paid, others not (e.g. Italy).

**EAA and EFTTA propose** Member States without a registration scheme in place today to introduce a system without pay. In any case, these member States should consult with the national recreational fisheries organisations beforehand. If the money from a fee is earmarked recreational fishing supportive initiatives and projects, then the recreational fisheries sector may be positive about a fee. But nobody is supportive of yet another tax, which only effect will be less participation in recreational fishing and do economic damage to all recreational fisheries dependant enterprises and communities.

### **Catch reporting**

A recreational fisheries catch reporting scheme is proposed.

**EAA and EFTTA's position** is that the obligatory reporting should be limited to stocks subject to Union conservation measures. Priority should be given to electronic reporting to make it easy for the recreational fisher to report after the fishing trip. However, some recreational fishers may prefer non-electronic reporting, which they should be allowed to.

## Marking of recreational fishing gears

This provision is already in force in e.g. Denmark, with regard to recreational nets and traps.

**EAA and EFTTA support** this provision, which makes it possible to identify the owner of a set or lost net or trap, as well as to identify the use of or illegally placed nets and traps.

The marking makes **no sense for rod and line fishing** (angling tackle), which should be exempted.

## Registration of (some) recreational vessels

It is proposed to: *"put in place a registration or licensing system for vessels used in such recreational fisheries [i.e. recreational fisheries subject to Union conservation measures], in addition to the registration or licencing system for natural and legal persons referred to in paragraph 1."*

### **EAA and EFTTA find this provision unnecessary and highly impractical for the following reasons:**

İ **Unnecessary:** All recreational fishers are obliged to be registered. Catches are regulated per individual recreational fisher, not per boat/vessel as is the rule for commercial fishers. So, there is no need for a recreational boat register as we see no added value for fisheries management. An exception is the vessel registration rules set for recreational tuna and sword fishing <sup>1</sup>. These rules are set by ICCAT and implemented by EU. EAA and EFTTA support these rules.

İ **Impractical (if not unworkable):** The registration concerns only some vessels, based on a few fish species, which may or may not be caught from that vessel. As there is no guarantee what a recreational fisher will catch of species, and as any floating thing, which can carry one person can be fished from, then all vessels, including row boats, kayaks etc. should be registered to make sense of that provision - and that we cannot support.

### İ **An all-inclusive recreational boat register has been suggested before**

**The European Boating Association (EBA)** was, and is, against such a register. EBA's position can be found [here](#). The EU Member States all have boat registers in place, but they differ with regard to, which boats are obliged to be registered, as well as to which boats can be registered voluntarily (some don't allow for smaller boats and jet water scooters). The register issue may be back on the agenda when the [Recreational Craft Directive](#) is up for review in 2022.

**Norway** introduced some 20 years ago an all-inclusive recreational boat register (more than 900,000 boats) but a couple of years later the obligation for small boats to register was changed to a voluntary [small boat register](#). Insurance companies give significant discounts for boats registered, which also requires a visible registration number on the side of the boat, and engraved in the hull and motor.

## Tracking of vessels used in (some) recreational fisheries

**EAA and EFTTA are against** this provision for the same reasons as mentioned in the vessel registration chapter above. However, registration and tracking might make sense for recreational vessels allowed to be and fish within a Marine Protected Area (MPA). Also, monitoring and measuring of fishing effort can happen via strategically placed [cameras](#).

---

<sup>1</sup> **Article 19 - Sport and recreational fisheries (tuna recovery plan; 2016)**

[https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L\\_.2016.252.01.0001.01.ENG&toc=OJ:L:2016:252:TOC](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.252.01.0001.01.ENG&toc=OJ:L:2016:252:TOC)

**Article 20 - Vessels authorised to target Mediterranean swordfish; (2017)**

[https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L\\_.2017.315.01.0001.01.ENG&toc=OJ:L:2017:315:TOC](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2017.315.01.0001.01.ENG&toc=OJ:L:2017:315:TOC)

## **Serious infringements**

The Commission has proposed to include recreational fisheries in the chapter about serious infringements (Article 90), with more details specified in the [Annex](#) to the main legislative text.

**EAA and EFTTA find that the text in the annex reads like a copy and paste from a commercial fisheries chapter, in need of a total rewrite or deletion to be fit for recreational fisheries.**

We suggest to not split the infringements into 'serious' and 'non-serious'. That split won't bring much added value but complicates fisheries control and the information of the recreational fishers. Also, the recreational fishers should not be severely fined for a first-time offense, but fines should increase with repeat offenses. The member States should decide the levels of fines, but with a possibility for the Commission to interfere should the control or the fines not be enforced or not work properly as a deterrent.

## **“Charter boats” – the need for a definition and separate provisions for this segment**

**There are two kinds of charter/chartered boats:** 1) skippered charter boats bringing anglers to fishing spots at sea, 2) privately hired boats used to fish from, without a skipper.

**Here we focus on skippered charter boats.**

The charter boat sector is directly and immediately affected by changes in fisheries management measures. As such, it is an important and early indicator of the economic impact fisheries management measures may have on the recreational fisheries sector as a whole. Charter boating has a growth potential, which fits very well the EU blue growth strategy. Charter boating is one of few businesses, which sustainably can operate in marine protected areas and generate much needed sustainable economic activity in these areas. The charter boat sector is not well organised nationally or at EU level. A charter boat definition, and explicit inclusion in this control regulation could be big positive step that direction. Registration and tracking of these (skippered) vessels could follow the same rules, which shall apply to small commercial fishing vessels. But the catches should not be counted or reported. The catches belong to the anglers onboard, who are obliged to register and to report their catches according to provisions mentioned further above in this position paper.

-----

## **Links to some background information:**

### **The EC proposal:**

İ **Main text:** [https://ec.europa.eu/fisheries/sites/fisheries/files/docs/com-2018-368\\_en.pdf](https://ec.europa.eu/fisheries/sites/fisheries/files/docs/com-2018-368_en.pdf)

İ **Annex:** [https://ec.europa.eu/fisheries/sites/fisheries/files/docs/com-2018-368-annex\\_en.pdf](https://ec.europa.eu/fisheries/sites/fisheries/files/docs/com-2018-368-annex_en.pdf)

### **Public hearing 12 Nov 2019:**

İ “Facing The New Challenges Of The EU Fisheries Control System”

[www.europarl.europa.eu/cmsdata/188181/Draft%20programme%20PECH%20public%20hearing\\_Fisheries%20Control\\_12.11.2019\\_EN-original.pdf](http://www.europarl.europa.eu/cmsdata/188181/Draft%20programme%20PECH%20public%20hearing_Fisheries%20Control_12.11.2019_EN-original.pdf)

### **EAA article, 8 June 2018:**

İ “Fisheries Control: the Commission’s proposal for a revised regulation published”

[www.eaa-europe.org/news/12540/fisheries-control-the-commission-s-proposal-for-a-revised-regulation-published.html](http://www.eaa-europe.org/news/12540/fisheries-control-the-commission-s-proposal-for-a-revised-regulation-published.html)

-----

**Contact:** Jan Kappel, Secretary General of the EAA

[jan.kappel@eaa-europe.eu](mailto:jan.kappel@eaa-europe.eu)

Office phone: +32 (0)2 725 11 15 Mobile: +32 (0)498 84 05 23