



Brussels, 19 November 2020

Dear Ms Charlina VITCHEVA, Director-General

By email only

Concerning sea bass 2021 – protection of juveniles

For a number of years, the *European Anglers Alliance* and the *European Fishing Tackle Trade Association* have stressed that the difference (from 25cm to 42cm) in the existing minimum conservation reference sizes (MCRS) set for sea bass is inappropriate. To protect juvenile sea bass the MCRS should be not less than 42cm, and the same for all EU waters. Furthermore, different MCRSs in adjacent waters also complicate fisheries management unnecessarily according to STECF and the Commission¹.

We ask you to support our call and propose to the Council the adoption of a harmonised MCRS of 42cm for all sea bass fisheries, recreational and commercial, in all EU waters with effect 1/1/2021.

SOME FACTS:

1) STECF advice: avoid having different MCRS applying in adjacent waters (June 2020)²:

- "In subarea 8 the mcrs for cod, **sea bass** and red sea bream, the mcrs proposed for recreational fisheries is greater than the current mcrs for commercial fisheries. However, for the rest of the SWW, the mcrs is harmonised with the current regulations contained in Annex VII of Regulation (EU) 1241/2019. There is no reason given for the difference in mcrs between the two areas. Extending the increased mcrs to the whole area would increase the benefit of the measure and avoid having different mcrs applying in different adjacent management areas."

2) The Commission suggested in 2016 that the bass MCRS should be 42cm in all EU Atlantic waters³

3) Sea bass is one of the most important species to Europe's ca. 10 million sea anglers, and the businesses dependant on anglers' spending, which is estimated 10.5 billion EUR; 100,000 full-time jobs⁴.

4) Sea bass' spawning size:

- a) the spawning size is the same for all EU waters, but bass grow faster to that size in southern waters.⁵
- b) at 42cm only ca. 50% female bass have reached spawning size.

5) The commercial bass fishery and the market:

- a) the bigger bass fetch higher prices on the market per kg, which is, should be, an incentive to catch and land the bigger bass.
- b) unfortunately, the discard ban does NOT apply to the bass fishery. Undersized bass are caught legally in nets with smaller mesh than needed to only catch bass at or over the set MCRS - then discarded.
- c) more than 90% (93.5%) of bass on the market are farmed: 81.852 ton vs. 5.337 ton wild (2016)⁶
- d) often restaurants sell farmed bass as wild bass, as the consumers and (some) chefs cannot (or won't) tell the difference. The existing differences in the MCRS adds to this problem.

Sincerely yours,

Fred Blot, President of the EAA

Olivier Portrat, CEO of EFTTA

¹ "The existence of different MCRS for the same species raises issues in terms of level playing field."; Commission Staff Working Document 20.12.2019 SWD(2019) 453 final https://ec.europa.eu/fisheries/sites/fisheries/files/docs/body/swd-2019-453_en.pdf

² <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC121260/kj-ax-20-004-en-n.pdf>

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52016PC0134>

⁴ "Research for PECH Committee - Marine recreational and semi-subsistence fishing - its value and its impact on fish stocks"; K Hyder et al (2017); [www.europarl.europa.eu/thinktank/en/document.html?reference=IPOP_STU\(2017\)601996](http://www.europarl.europa.eu/thinktank/en/document.html?reference=IPOP_STU(2017)601996)

⁵ "The size at which 50% of the females are mature (L50%) is 42.14 cm (low limit 41.31 cm and upper limit 43.08 cm)"; ICES WKBASS REPORT 2018; chapter 5.2.1.2 Maturity www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2018/WKBASS/wkbass_2018.pdf

⁶ "Sea Bass in Europe"; EUMOFA (2019) www.eumofa.eu/documents/20178/121372/PTAT+Case+Study+-+Seabass+in+the+EU.pdf