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ASSOCIATION NATIONALE DES ORGANISATIONS DE PRODUCTEURS (ANOP)  
Fish Producers Organisation, PECHEURS DE BRETAGNE  
Fish Producers Organisation, FROM NORD  
UNION DES ARMATEURS A LA PECHE DE FRANCE (UAPF)  
THE CHAIRMANS

Paris – 18/10/12

REGISTERED LETTER  
WITH ACKNOWLEDGEMENT OF RECEIPT

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Subject: Your article in press “Sustainability of deep-sea fisheries under the European Union Common Fisheries Policy”

Dear authors,

Our attention was drawn on your article published on 29/09/12 on the Bloom Association website. We discovered that your paper is in fact also available under proofread copy waiting for a final publication on the website of the magazine « Ocean & Coastal Management ». Our organizations represent numerous fishing companies managing vessels that fly the French flag and catch the deep-sea species on which your article focuses. We are addressing you as the co-authors of this document.

In first instance, your analysis on the degree to which the European Commission follows the scientific advices for its proposals of TACs, and to which the EU Council follows “in fine” the scientific advices, is a matter of debate for both ICES, EU Commission and EU Council, which will receive a copy of this letter.

Concerning your analysis on the degree to which “*industry respected the agreed—to catches limits of deep-sea fish stocks*”, you claim that between 2002 and 2011 the registered catches were on average 3,5 times greater than the TACs chosen (“*Reported catches are on average 3.5 times greater than the TACs for deep-sea species during 2002-2011 period, although in some cases catches were 10-28 times higher than the approved quotas*”) and condemn a “*lack of enforcement at the level of national fisheries authority, which affected most of the stocks analyzed*”.

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Moreover, you add that during the same period in 50.6 % of the cases the TACs on these species were not respected and explicitly refer to Figure 6 (right panel) of your article comparing reported catches and approved TACs.

These statements are false and flawed, as shown by the registered catches with the Commission. They are not supported by any detailed data and your assertions tarnish the reputation of the companies we represent. More generally, they harm the credibility of the common fisheries policy.

Besides, you refer to the 2007 ICES Advisory Committee's report to declare that latest scientific evidences suggest that numerous deep-sea species are currently exploited beyond sustainable levels (« The current scientific evidence suggests that many deep-sea fish stocks are being exploited beyond sustainable levels »).

Since 2007, the ICES issued several management advices. By focusing on a publication going back to five years ago, you intentionally disdain the latest advices.

As your article rests on deep-sea species, we recommend you to refer to the 2012 ICES management advices, which emphasize on a different reality.

We would be grateful if you could use right data to correct your analysis and accurate references to correct your assertions based on obsolete sources.

Failing that, or if you were tempted to publicly point out erroneous results, we could be led to catching up with our legal advisers to seek compensation for the damages caused to the European industry, and more specifically to the French one.

Moreover, we wish to draw your attention to ambiguities and shortcomings in your article.

We note that you studied the bathymetric expansion of European fleets and you classified several national fleets' behavior.

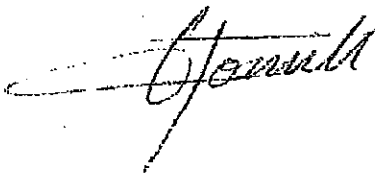
Your article mentions the method used to determine the mean fishing depth from the average depth of occurrence of the species caught, and links it to the fleet catches mean longevity of the EU fisheries and its evolution.

Nevertheless, you do not clarify how you infer longevity from a depth. Looking at your results, a reader can even be led to think that the mean longevity of the catches is the mean of the longevity of each species caught, and is not counterbalanced by the quantities of each species caught.

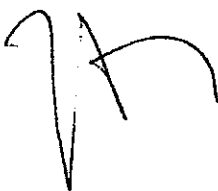
At a general level, you do not provide any data as supplementary material to support your study, contrary to common practices. This makes impossible to carry out a real review of your results.

Sincerely yours


Gérard ROMITI, Chairman of CNPMMEM



Jean-Marie ZARZA, Chairman of UAPF



Antoine DHELLEMMES, Chairman of ANOP  
and FROM NORD



Patrice DONNARD, Chairman of Pêcheurs de Bretagne



CC.

Members of Fisheries Committee of the European Parliament; M. Ángel BOIXAREU CARRERA; General Secretariat of the Council of The EU, Directorate-General B, Director-General; Ms Lowri EVANS, European Commission, DG MARE, Director-General; M. Jean-Jacques MAGUIRE, Chair of ICES ACOM; Fishing Industry National and EU representatives: EUROPECHE, EAPO, COGECA, CEPESCA, NFFO, SFA, KFO; M. V.N. De JONGUE, Editor-in-Chief, Ocean & Coastal Management (Registered letter with acknowledgment of receipt)

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