



The untrawled truth: Why EU fisheries policy should strengthen discard monitoring, control and reporting within an implemented landing obligation.

Discarding unwanted catches of regulated species has been illegal throughout EU fisheries since 2019. However, appropriate fisheries control measures are still missing. New research now reveals which parts of the EU fishing fleet have the biggest problem with recorded discards.

The analysis¹ **exposes the scale of problems associated with implementing the landing obligation in different EU fishing fleet segments** based on the official discard reporting. The findings aim to inform the current revision of the EU fisheries Control Regulation, particularly the debate on the scope and future implementation of the requirement to install remote electronic monitoring (REM), with the purpose of enabling reliable and effective monitoring, control and enforcement of the landing obligation.

This analysis shows that vessel length is not the appropriate basis to decide **which vessels need to be monitored and controlled through the use of REM to safeguard the effective implementation of the landing obligation**. Instead, the most common factor for large amounts of discards is the type of fishing gear in use.

While the Council of the EU, representing EU Member States, is contemplating REM only on certain vessels over 24 metres in length, and the European Parliament (EP) only on vessels over 12 metres in length, the European Commission has proposed an REM requirement without a vessel length criterion. The analysis compares the potential outcomes of the two proposals which would see REM required only on vessels above 12 or 24 metres. Publicly available data published by the Scientific, Technical and Economic Committee for Fisheries (STECF)² was used to calculate the total amount of reported discards for different vessel length classes, as well as types of fishing gear in 2019.

¹ https://wwfeu.awsassets.panda.org/downloads/2022_wwf_the_untrawled_truth_1_1.pdf

² Catches and Discards Dataset: <https://stecf.jrc.ec.europa.eu/dd/fdi> (Accessed 15 November 2021)

The study concludes that:

- **92% of all recorded discards come from vessels using demersal (bottom-contacting) trawls – regardless of their length** and gear configurations.
- **the largest vessels (>24m) are responsible for 37%** of the recorded discards. The Council's proposal would therefore leave the majority of discards unassessed and unaccounted for.
- **the smallest vessels (<12m) contribute a low percentage to the recorded discards but have the highest number of total fishing days (75% of days all EU vessels spend at sea) and represent 84% of all EU vessels.** The EP proposal would therefore rule out effective control of enormous amounts of EU fishing activity.
- **the smallest vessels (<12m), with reduced amounts of space on board, bring ashore the most valuable fish per weight.** While often catching high value species, these vessels can harm sensitive, threatened and endangered species, such as marine mammals and seabirds.

Therefore, both the Council and EP proposals, as currently drafted, **would fail to accomplish the objectives of the Common Fisheries Policy.** Both proposals fall short of properly addressing the decline of fish stocks due to non-compliance with the landing obligation and unprecedented levels of sensitive species bycatch.

The findings underline the importance of substantially increasing **REM to cover a diverse set of fleet segments** based on their risk of unwanted catches. This will ensure better monitoring, control and enforcement of the EU landing obligation, whilst providing data for managers to address the bycatch of protected, endangered and threatened species.

On the basis of this study, we ask you to:

- **Require the use of REM on board all EU fishing vessels above 12 metres in length**
- **Use REM onboard all small-scale vessels (below 12 metres in length) at high risk of non-compliance with the rules of the Common Fisheries Policy, and those at risk of catching protected, endangered and threatened species.**

Verified and timely catch data are essential to achieve and secure long-term sustainability of European fisheries. If used correctly, they can be instrumental for the collection of reference data and thus increase the reliability of stock assessments, inform catch quotas, and determine the conservation risk of protected species, as well as help with adaptive management. We therefore recommend the introduction of REM not only to support the landing obligation, but other rules of the Common Fisheries Policy.

The ongoing trilogue negotiations provide the opportunity to future-proof the EU fisheries control system for years to come. The revised Control Regulation must ensure that EU fisheries will be properly and sustainably managed with the aim of minimising the environmental impacts of fishing activities. **This is essential to reach the goals and objectives of the Common Fisheries Policy and help stop illegal, unreported and unregulated (IUU) fishing in European waters.** It would also help to create more climate resilient and healthy marine ecosystems in line with the goals of the European Green Deal, the EU 2030 Biodiversity Strategy and other environmental legislation such as the Marine Strategy Framework Directive.

We, the undersigned NGOs, call on you to translate these ambitions into a sound revision of the EU fisheries Control Regulation to make the essential difference for our fish stocks, ocean and climate.