

КОНСУЛТАТИВЕН СЪВЕТ ЗА ЧЕРНО МОРЕ /КСЧМ/
CONSILIUL CONSULTATIV PENTRU MAREA NEAGRA

Сдружение, вписано в РЮЛНЦ
на Р България
ЕИК 176964109
Седалище и адрес на управление:
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Asociatie, inregistrata in Registrul
persoanelor juridice fara scop patrimonial
al R Bulgaria, CUI 176964109
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No 75/18.12.2019

**To: DG Directorate-General for Maritime Affairs
and Fisheries
In attention: Mr Bernhard Friess**

Dear Mr Friess,

We would like to submit to your attention a very important aspect related to fishing sector in Romania. This topic was discussed during the Working groups dedicated to Illegal, Unreported and Unregulated fishing, on 25.09.2019, in Constanta Romania, part from the Black Sea Advisory Council working program for 2019.

The Executive Committee supports the point of view presented through this letter.

The Small Scale Fishery represents an important part of the Romanian fishing sector, in 2018 having 133 boats representing 80% of the total number of vessels. We acknowledge the social, economic and environmental importance of this sector, but we are concerned that in some cases there is lack of transparency and some considered to be small scale fishermen are in reality posing a greater impact on sustainable fishing.

According to Romanian Government Ordinance no 23/5.03.2008 an auxiliary fishing vessel is defined as: any vessel that is not directly involved in the fishing activity, but serves fishing vessels, aquaculture facilities or stationary fishing facilities. Based on this definition only, in Romania it is possible for a small scare fishermen to authorize more than 3-6 auxiliary boats that are serving one small fishing boat included in the Fishing Ship file.

This practice leads to the following reporting results, based on ANPA statistics:

- One boat of 6,5 m length reported for 2018 a total catch of 1 415 kg of Rapana welck and 11 851 kg of mussels – in the file attached you can find this under the name Black Sea OPS/5425 – Ct Auxiliary – meaning that is an auxiliary vessel with no fishing activity
- One boat of 7,5 m length reported for 2018 a total catch of 5 310 kg of Rapana welck and 9 300 kg of mussels – in the file attached you can find this under the name Pontica Star /4367 – Ct Auxiliary – meaning that is an auxiliary vessel with no fishing activity

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- Example of catches: a 7,36 m lights boat reports a 271 704 kg catches for Rapana and mussels only and a 25,3 m boat reports 323 145 kg of Rapana in 2018. The difference is very small comparing with the capacity and this is justified by the involvement of the auxiliary boats.

Also, according to ANPA address 448/17.09.2019, there are 29 companies authorized for manual harvesting of Rapana welck (with divers) and they have 58 auxiliary boats.

The Working Group above mentioned, considers this practice as a threat for IUU fishing and even after communicating this to ANPA (during the WG), on 18.11.2019 it was submitted for debate a Proposal for e Ministry Order that states at Art 10, point 11 the fact that it is allowed to have an auxiliary boat for each boat registered in the Fishing Ship File. This will legalize this practice.

In Bulgaria only the fishing vessels in the registry have the right to carry out fishing activity. Auxiliary boats can only carry out recreational fishing in limited quantity. If fishing vessels are carrying out commercial fishing, they should be listed in the public registry.

Also, this legislation gaps allow discrimination and an unfair treatment of fishing companies. Moreover, these practices increase the risk for Illegal, Unreported and Unregulated fishing in the Black Sea. The perpetuation of this practice can constitute a precedent and more countries to adopt it.

Please send us a point of view and exemples from EU practice related to this kind of activity.

YOURS SINCERELY
Secretary General BLSAC
Florin Luchian

