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COVID-19 Crisis Response: Increased Interannual Quota Flexibility Is Risky And Unnecessary

The current COVID-19 crisis poses an immediate threat to the European fisheries sector - but an ill-conceived crisis response could put at risk the sustainability of EU fisheries for years to come, including the future of fish stocks and of those that depend on them.¹ The European fisheries sector has been lobbying for measures to soften the blow of the crisis.² One request relates to an increase in the interannual quota flexibility from 10% to 25%, in addition to various support policies that have already been adopted. This document explains why **increasing interannual flexibility is a dangerous idea that policy-makers must resist if they are to protect and build on the progress made so far towards ending overfishing.**

Fisheries depend on limited natural resources and a wrong decision to increase annual catches beyond scientific advice can jeopardise short- and long-term sustainability alike. The proposal means that up to 25% of the 2020 quota could be added on top of next year's fishing limits. Assuming that the latter are set in line with scientific advice, this means that the extra 25% would go above scientific advice.

The result of this request could be catastrophic for both fish stocks and the fishing sector. This approach is neither compatible with the 10% specified in the Common Fisheries Policy (CFP) Basic Regulation and its fundamental sustainability objectives, nor with the healthy functioning of marine ecosystems.³

It must be underlined that specific measures are already available to mitigate the impact of the COVID-19 outbreak in the fishery and aquaculture sector,⁴ and they were welcomed by the fisheries sector.⁵ This includes support for the temporary cessation of fishing activities, financial compensations to aquaculture farmers and to processing enterprises, support to producer organisations for the storage of fishery and aquaculture products, and more flexible reallocation of financial resources within the European Maritime and Fisheries Fund (EMFF). **Further requests for more flexibility and quota increase are not justified from the policy, environment, science and market point of view.**

Therefore, **environmental NGOs strongly urge decision-makers to say no to this request, which clearly misses the mark on sustainable fisheries and healthy marine ecosystems, and makes no sense scientifically and economically.** In particular:

1 For detailed recommendations regarding an appropriate response to the COVID-19 crisis, please refer to this joint NGO paper: Griffin Carpenter (2020): Setting the right safety net: A framework for fisheries support policies in response to COVID-19. April 2020. <https://www.documents.clientearth.org/library/download-info/setting-the-right-safety-net-a-framework-for-fisheries-support-policies-in-response-to-covid-19/>

2 See for example Europeche's press release from earlier this year: <https://europeche.chil.me/post/fishing-industry-welcomes-eu-support-to-overcome-the-socio-economic-turmoil-caus-295161>

3 It falsely assumes that fish that are not caught this year will still automatically be there for the taking next year, which completely ignores the dynamic nature of the ecosystem, including natural mortality, for example due to fish eating other fish.

4 https://ec.europa.eu/fisheries/coronavirus-response-fisheries-and-aquaculture_en

5 <https://europeche.chil.me/post/fishing-industry-welcomes-eu-support-to-overcome-the-socio-economic-turmoil-caus-295161>

- The effects of the COVID-19 crisis in the fisheries sector must not be viewed in isolation. Tackling the COVID-19 crisis with an increase of the interannual quota flexibility from 10% to 25% will contribute to overfishing and worsen the ecological situation.
- Increasing the interannual quota flexibility can aggravate the problem of overfishing, because any underuse of TAC in one year is already incorporated into stock assessments and into the resulting scientific advice as abundance improves. Where there is a lag between the catch data and the scientific advice, and considering that a third of assessed EU fish stocks are still outside safe biological limits,⁶ any reprieve should be welcomed, not over-exploited. Adding extra quota beyond this advice is unsustainable, going against both science and the law. COVID-19 does not change the underlying biology of fish populations, nor does it resolve the problem of compounding TACs.
- EU support should be designed to cover the loss incurred during the COVID-19 crisis and the fisheries sector already benefits from European funds designated to fishers that cannot go to sea and catch their allocated TACs for 2020. Requesting the EU to provide both interannual flexibility and income support would present a double compensation.
- More quota flexibility does not make sense from the economic point of view either: it could have the unintended consequence of crashing prices in 2021 due to large increases in landings, excess supply and limited storage capacity. It poses the question of what would happen to all the extra fish if demand remains low due to the ongoing crisis? This question is particularly relevant in the case of fresh catch destined for the HORECA sector, currently in lockdown in many EU countries. Short-sighted decisions to increase catches in 2021 would result in both short-term financial and long-term environmental losses.

Clearly, increasing interannual quota flexibility is not a solution but the source of new problems. Rather than deregulation, what is needed is new policies to address the COVID-19 crisis and set a path towards a healthier fishing sector and marine environment. We therefore jointly call on EU decision-makers to resist this and similar demands, and ensure that any COVID-19 crisis response policies contribute to “building back better”. Alternatives to meet this intent are explored in more detail in the joint NGO paper [Setting the right safety net: A framework for fisheries support policies in response to COVID-19](#).⁷

⁶ Based on the most recent CFP monitoring report by the Scientific, Technical and Economic Committee for Fisheries (STECF 20-01), 14 out of 44 assessed stocks were still outside of safe biological limits (i.e. fishing mortality $F > F_{pa}$ and/or biomass $SSB < B_{pa}$), and 26 out of 68 assessed stocks still overfished (i.e. $F > F_{msy}$), in 2018, the most recent year for which this information is available. STECF-Adhoc-20-01. Publications Office of the European Union, Luxembourg, 2020, ISBN 978-92-76-18115-6, doi:10.2760/230469, JRC120481.

⁷ Carpenter (2020). See footnote 1 for full reference. Increased interannual quota flexibility is also covered in this paper, on p. 14.