



**EU Fish Processors and Traders Association
Association des Industries du Poisson de l'UE**

**EU Federation of National Organisations of Importers and Exporters of Fish
Comité des Organisations nationales des importateurs et exportateurs de poisson de l'UE**

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AIPCE-CEP Opinion Paper: Discard Ban

Introduction

Discards are those parts of the catch that are returned to the sea. The discarding of fish species is a wasteful practice that should be avoided as much as possible. Reducing the impact of discarding endorses the objective of minimising waste of the fishery resource and reducing pressure upon vulnerable fish stocks while maintaining an economically viable fishing industry based on fisheries that are managed sustainably. In light of the reform of the Common Fisheries Policy, AIPCE-CEP share the Commission's vision in its fight to reduce discards and there is an urgent need to implement measures to reduce the level of discarding wherever possible.

It is the view of our industry that efforts should primarily focus on discard avoidance at fisheries level rather than dealing with discards once landed. We see the development of more selective fisheries innovations integrated in fishery-by-fishery long term management plans as the most appropriate vehicle for implementing discard reduction measures. These are plans to maintain fish stocks on a long term basis at levels capable of producing maximal sustainable yields.

In the context of landing obligations, a direct result of the proposed 'discard ban' in certain regions, we are not in favour of simplistic 'one size fits all' approach to tackling discards, since there are different types of discards and types of fisheries.

Market Implications

In cases where landing obligations are inevitable, it is important to take into consideration possible implications for minimum landing sizes. It would be useful for our industry to get more clarity on which part of the catches will be available for the market, or for human consumption.

A discard ban does imply that discards are counted against quota. Unless producers succeed in bringing down the amount of discards, the amount of marketable fish could decline. For mixed fisheries this could have a serious impact on the economic situation of producers and the supply for the market.

The pet food and aquaculture sectors appear to be a best candidate destination for landed discards not intended for human consumption or charity. The level of attraction of discards all depends on the form in which they are presented. Member States where fishmeal production is significant such as in Scandinavia, will have better opportunities to market discarded fish. Transporting discards to those countries may however not be cost effective.

Unreported discarding presents an issue to fishery scientists in accurately determining levels of fishing mortality and therefore has the potential to distort scientific stock assessments. It also represents a major public issue in terms of reputation of our sector, and consumer confidence. In order to ensure proper enforcement of the discard ban we encourage strict monitoring through fully documented fisheries.

We encourage more research on discard mortality in order to limit the landing of species that have a high survival rate such as flounder, turbot or brill.