



For the attention of: Mr Poul Degnbol, Head of Advisory Programme, ICES.

Subject: EU Commission Review of MSFD Descriptor 3.

Dear Mr. Degnbol,

I am writing to you on behalf of Marinet, the UK community marine network and an OSPAR Observer Member, regarding the review of MSFD Descriptor 3 (Good Environmental Status definition for commercial fish and shellfish) which ICES has been asked to undertake on behalf of the EU Commission, with particular reference to the ICES Workshop on this subject on 4/5th September in Copenhagen.

Our resources do not make it practical for us to attend this workshop, and so please accept our apologies.

However, we have very clear and definite thinking on this subject, and I am writing now to inform you of this thinking so that you may place it before your Workshop on 4/5th September.

This thinking is summarised in an Agenda Paper we are presenting to the OSPAR meeting on Descriptor 3 in London on 12th September, and a copy of this Marinet paper to OSPAR is attached, titled OSPAR MSFD D3 Agenda Paper Sept 14.doc.

Essentially, we want you (ICES) to understand that if “good environmental status” is to be restored to the seas of the North East Atlantic, then it is of absolute and paramount importance that stocks of all fish and shellfish species are fully restored both in population size and in the age and size profile of those populations. If this does not occur, then the marine ecosystem in the North East Atlantic will continue to remain severely degraded, not only because the character and size of these populations are depressed below the levels which current ecological conditions will allow, but also because healthy populations of all fish and shellfish species are essential for a genuine healthily functioning marine ecosystem.

We hold that the scientific truth of the above statement is beyond question. And, we hold that this is the declared intention of the Marine Strategy Framework Directive, both in legal terms and in its spirit.

We explain in our OSPAR Agenda Paper how a full and proper implementation of MSFD Descriptor 3 can practically achieve the restoration of stocks of all fish and shellfish species. This is a scientific goal which can be readily achieved in practical terms, and simply requires the implementation of the correct management regime for fisheries. In short, there is no scientific impediment to the full implementation of Descriptor 3, and we ask that ICES and its scientific advice states this clearly to the EU Commission.

We recognise that a full implementation of Descriptor 3 is being questioned by some people, largely people of a political persuasion who do not wish to re-organise the management regime for

fisheries. However if Descriptor 3 is revised for these reasons, then these are clearly political reasons and not scientific ones.

Accordingly, we are requesting that ICES stands up for scientific truth and reality at the meeting in Copenhagen on 4th/5th September, and clearly informs the EU commission that, on the basis of science, there is no doubt that Descriptor 3 can be fully implemented.

Very simply, we observe to you, if the scientists (ICES) do not stand up for the genuine restoration of full ecological health to the North East Atlantic, then the situation for our seas has become very serious indeed.

We would be grateful if you would make available to us the full details of the outcome of the 4/5th September Copenhagen Workshop.

Sincere regards,
Stephen Eades,
Marinet Director.

cc. David Levy, Marinet Chair
John Stansfield, Marinet Member