

ISSUES ABOUT THE EU-SENEGAL SFPA PROPOSAL

On behalf of CFFA and its Senegalese partner APRAPAM, we would like to raise the following issues about the EU-Senegal Sustainable Fisheries Partnership Agreement (SFPA) proposal that is now under scrutiny of the European Parliament:

1. Access to resources

- Small pelagics

Small pelagics, sardinella in particular, occupies a very important place in Senegal fisheries, in terms of landings, local consumption, jobs or exports:

- Some 60% of the 400,000 tons of the Senegalese artisanal fishery landings are made of sardinella;
- Nearly 12,000 artisanal fishermen, -20% of the Senegalese artisanal fishermen-, live only from the sardinella fishery. In addition, artisanal processing and distribution channels associated with the sardinella fishery, characterized by low investment required, qualification and know-how, employ thousands of people. The importance of the female component in the artisanal processing sector is a favorable factor for poverty-reduction policies.
- In terms of food security, sardinella is the most accessible source of animal protein in terms of price and quantity. Many Senegalese families, nowadays, have only one meal a day: a lunch based on rice and sardinella.

Currently, the state of the sardinella resources is worrying. The FAO/CECAF working group held in June 2013, in Nouadhibou (Mauritania), found that, as in previous years, sardinella stocks are overexploited, and that fishing effort must be substantially reduced. Senegal artisanal fishing has already taken some measures, like a ban on the fishing, selling and processing of juveniles, or temporary fishing closures.

We feel access to this strategic resource should be reserved to sustainable small scale fisheries. We are therefore happy that no access was negotiated for sardinella in the EU-Senegal SFPA.

However, EU and other foreign vessels targeting small pelagics operate in the region (Morocco, Mauritania particularly). This is something that already has an impact on our small pelagic resources in Senegal, since these are shared resources.

What is urgently needed is regional management of the exploitation of these resources, giving priority access to those who fish most sustainably, for direct human consumption (and not for fishmeal). We require that, through the partnership, both Senegal and EU should make all necessary efforts to promote such regional management.

Indeed, the reformed CFP Regulation includes the need for the CFP External Policy to “improve policy coherence of Union initiatives, with particular regard to environmental, trade and development activities and strengthen consistency of actions taken in the context of development cooperation and scientific , technical and economic cooperation” (Article 28 2 (b)).

- **Tropical tuna**

Regarding tropical tunas and associated species, which is the main species where fishing possibilities are available to EU vessels, it is a fishery practiced in the entire Atlantic Ocean and the management of which is in the hands of the International Commission for the Conservation of Atlantic Tunas (ICCAT). Access conditions in the agreement must at a minimum comply with ICCAT’s management measures.

We would also like to underline that some provisions like the reporting of catches data in real time or the boarding of observers are key for all fisheries. If such systems are put in place for EU tuna vessels, they should, as a matter of urgency, be extended to all fleets operating currently in Senegal without any transparency.

- **Access to hake**

Since the termination of the Protocol to the Fisheries Agreement in June 2006, hake has no longer been a targeted species. It is only caught as by-catch of shrimp trawlers. According to the EC ex-ante evaluation, *‘the potential for a future agreement with the EU to include authorizations for fishing for hake in Senegalese waters is uncertain as no ‘biological and financial feasibility study’ has taken place to confirm the viable total allowable catch level’*.

The ex-ante evaluation study makes it clear that a more in depth analysis is required to be able to decide on the catch potential and the status of hake stock, as required under the 2013 CFP Regulation. In such situation, the precautionary approach has to be followed:

- The EU needs up to date, reliable scientific data prior to considering fishing possibilities on hake under this agreement;
- If such data reveals that there is a possibility to exploit this resource under the agreement while restoring and maintaining the stock at a level of abundance well above that capable of producing MSY in the long term, such vessels should use selective and non-destructive fishing techniques. Efficient means of monitoring, control and surveillance of these vessels should be put in place.

We insist that Senegal artisanal fishing sector stakeholders must be involved in the works of the EU-Senegal joint committee and any other for a which will decide on conditions for hake fishing, and evaluate the impacts of EU fishing vessels activities on Senegalese small scale fishery. We believe this representation is required as this sector will be affected both because it catches small amounts of hake (in the region of Kayar) and because the octopus and shrimps, caught as by-catch by the Spanish trawlers, are species targeted by the artisanal sector.

2. Transparency, participation and accountability

The absence of these three elements is for us the main failure so far regarding the negotiation of this agreement. Unlike in previous agreements negotiations, since 1994, Senegalese small scale fishing stakeholders have neither been consulted nor admitted to the negotiations as

observers. Information provided to the public by the authorities has been incomplete, and in some instances, erroneous.

We ask that, in the future, artisanal fishing sector stakeholders should be adequately informed, including by attending, as observers, meetings of the EU-Senegal SFPA Joint Committee.

Regarding the monies proposed for sectoral support, one of the priorities identified is supporting the artisanal fishing sector. Several meetings have already taken place to discuss priorities for the use these monies, which is positive.

We ask that transparent and participatory mechanisms be put in place to ensure transparency and accountability about how these monies will be used, and to monitor whether the objectives are achieved.

The agreement also promotes the idea that sectoral support could be linked with a support from the European Development Fund (EDF). It is a good thing but this should be done in the greatest transparency.

We require that Senegal artisanal fishing professionals participate in joint meetings which will be discussing the use of sectoral support.

3. Joint ventures

We are very worried about the content of article 10 of the proposed SFPA entitled “Cooperation amongst professional organizations, private sector and civil society”. First because cooperation between these actors cannot be achieved in a context where we have neither been informed nor involved in the negotiating process.

Secondly, because (art. 10.3) it is said that parties will promote the creation of joint ventures.

Fishing joint ventures in Senegal operate nowadays in the greatest opacity, which rules out accountability. It is certainly not a model we feel should be promoted without a reflection about how to make their operations transparent, accountable and in line with sustainable fishing exploitation and the preservation of eco-systems in Senegal.

Yours sincerely,

Association pour la Promotion
et la Responsabilisation
des Acteurs de la Pêche
Artisanale à MBour
Gaoussou Gueye
Président

Gaoussou Gueye
Président APRAPAM



Béatrice Gorez
Coordinatrice CAPE