



EU-Senegal Protocol to the Sustainable Fisheries Partnership Agreement

Priorities for small-scale fisheries

Issues and expectations of professionals of artisanal fisheries and civil society in Senegal.

Summary of the Protocol Agreement content

The Protocol, signed in July 2019 and covering a period of 5 years, foresees

Fishing possibilities for:

- 28 frozen tuna seiners;
- 10 bait boats;
- 5 Tuna long liners;
- 2 Hake trawlers¹ ;

It is therefore an essentially tuna agreement. Tuna is managed by the International Commission for the Conservation of Atlantic Tunas (ICCAT/CICTA), which allocates quotas to the various fleets, including the European fleet.

The reference tonnage (which is the estimated quantities of tuna granted to the European fleets by ICCAT that they will fish in Senegalese waters) is 10,000 tons.

There is also access for two hake trawlers with a maximum authorized catches of 1750 tons per year (*2000 tons under the previous protocol*).

The annual financial contribution will amount to EUR 1 700 000, made up of:

- 800 000 linked to access (reference tonnage of 10 000 tons for tuna and authorized catch of 1 750 tons for black hake).
- Sectoral support of EUR 900 000 per year (EUR 750 000 per year under the previous Protocol) to promote sustainable fishing in Senegal. The priorities for the use of this

¹ These are two trawlers fishing at the same time. Over the year, there may be more different European trawlers involved in this fishery, but never more than two at the same time.



sectoral support are as follows:

- sustainable management of resources ;
- improvement of the Monitoring, Control and Surveillance of fisheries activities;
- development of scientific skills, research into fishery resources and data collection;
- support for small-scale fisheries;
- development of aquaculture;
- products valuing, control and health certification of fisheries products;
- Capacity building for stakeholders of the sector.

In addition to these amounts, there is an estimated amount of EUR 1,350, 750 per year in fees payable by ship-owners for fishing authorizations issued.

Comments

The European Parliament is currently discussing a proposal for a new protocol to the EU-Senegal Partnership Agreement on sustainable fisheries.

A first proposal for a parliamentary report was presented to the European Parliament's Fisheries Committee on 19 February 2020. This proposal is also to be examined by the National Assembly of Senegal.

In the context of these discussions by elected Senegalese and European officials, our organizations have the following comments:

- **TRANSPARENCY**

We note that transparency is a general consideration in the protocol, but there is no specific article on the issue, as is the case in the EU/Mauritania protocol² , in which Senegal is committed to *'publish any public or private agreement authorizing access to its EEZ by foreign vessels, including: States or others...'.entities participating in the agreement; the period or periods covered by the agreement; the number of vessels and gear types authorized; the species or stocks authorized for fishing, including any applicable catch limits; the*

² See PROTOCOL defining the fishing opportunities and financial contribution provided for in the Fisheries Partnership Agreement between the European Community and the Islamic Republic of Mauritania [https://eur-lex.europa.eu/legal-content/FR/TXT/HTML/?uri=CELEX:22015A1201\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/FR/TXT/HTML/?uri=CELEX:22015A1201(01)&from=EN)



reporting, monitoring, control and surveillance measures required; a copy of the written agreement'.

Today, the only agreements for which we have the texts are the ones with the European Union.

Such transparency regarding the access of foreign fleets, given the recent arrivals of foreign boats in Senegalese waters, would be a salutary measure to be implemented in order to ensure sustainable fisheries and protect Senegal's artisanal fisheries communities.

We also want transparency with regard to sectoral support (the amount of which is increasing from EUR 750,000 per year to EUR 900,000 per year), both in terms of the way in which choices of activities to be financed are made and the way in which expenditure is implemented.

There is currently no mechanism for transparency on the actions that have been carried out and the committed amounts, and no participation of civil society in the definition and implementation of these actions.

The only information available to us has been provided informally. Senegal's annual report to the European Union on the use of sectoral support is not published, and the actions undertaken with sectoral support money are not identified as such.

We note that a priority for sectoral support is "scientific capacity development, fisheries research and data collection". These aspects are very important, but we have already pointed out that CRODT has neither benefited from its funding, nor from these funds, since 2015.

We think it is absolutely crucial that CRODT can finally have the means to function, and also to really benefit from sectoral support.

We particularly want concrete actions taken to develop solid research on the alarming state of our small pelagic resources, which are shared with our neighbors. The training and recruitment of scientific observers and investigators is urgent.

We also believe that participatory monitoring should be supported. Such monitoring involving artisanal fishers has proven its usefulness in recent years - the majority of vessels boarded for illegal fishing in Senegalese waters have been identified through the indications given by artisanal fishers to the monitoring.



Actions in favor of security at sea (geo-location kits, vests) are also useful for our fishermen.

As regards women processors, although we are in favor of support for the improvement of their working conditions, as stated in the European Parliament's draft report³, one of their main concerns is today, the following the overexploitation of sardinella, they no longer have any raw material to process.

- ACCESS TO RESOURCES

First of all, we would like to recall that the member states of the SRFC⁴ must, when negotiating agreements with third countries (EU, Russia, China) with a component of "access to fishery resources", *to comply with the Convention relating to the Determination of Minimum Access and Exploitation Conditions for Fishery Resources within Maritime Waters under the Jurisdiction of Member States of the SRFC⁵* ratified in 2012 - usually referred to as the "MAC Convention".

The MAC Convention constitutes a concerted and harmonized regulatory instrument for the sustainability of resources and their contribution to food security in addition to defining the conditions of access to fishery resources within the SRFC⁵ area and integrating new international instruments to fight against illegal, unreported and unregulated fishing. This Convention also takes into account the needs of sustainable artisanal fisheries in the region.

- No access to small pelagic

It is very positive that the EU pelagic trawler fleets do not have access to small pelagic, especially sardinella, in Senegal. However, it should be noted that live bait used by the bait boats consists of small pelagic, mainly the already overexploited sardinella.

This fishing with live bait, generally targeting juvenile sardinella, as it is done nowadays in an anarchic way by artisanal fishermen, will aggravate a currently catastrophic situation.

Indeed, our greatest concern with regard to small pelagics remains the fact that access to sardinella and horse mackerel is allocated in Mauritania to fleets of foreign origin, particularly those of Russia, Turkey and China (Poly Hondone/Sunrise).

³ http://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/PECH/PR/2020/02-19/1197427FR.pdf

⁴ Le Cap Vert, la Gambie, la Guinée, la Guinée Bissau, la Mauritanie, le Sénégal, le Sierra Leone

⁵ https://www.itlos.org/fileadmin/itlos/documents/cases/case_no.21/Convention_CMA_fr_210814.pdf



This overexploitation is taking place in the absence of a joint research and management framework, while the sardinella resources shared between our countries are overexploited, in particular for processing into fish oil and fishmeal.

In Senegal and Gambia, the proliferation of fishmeal plants aggravates the situation of our sardinella.

Within the framework of the EU agreements with Senegal, but also with Mauritania and Gambia, it is essential to support the improvement of research on small pelagic resources (training of scientific investigators and observers, sufficient sampling, etc.) and the development, with adequate financial and human resources, of an ambitious collaboration between the research institutes of these countries of the sub-region: this collaboration should include dialogue between researchers and professionals in the fishing sector, especially small-scale fishing, to take into account the empirical knowledge of professionals, but also to improve data on local fishing effort and catches.

The future concerted management of our sardinella should give priority to the exploitation of sardinella for human consumption. At a workshop held in Senegal in May 2019, representatives of artisanal fisheries from across the region called for the progressive closure of existing fishmeal plants. Women processors in particular denounced the competition they face with fishmeal plants for access to fish.

Given that the EU's partnership agreements want to be based on the promotion of sustainable resource management and food security, it is important that the framework for dialogue provided by the partnership agreement addresses this issue.

- Access to hake

The maximum allowable catch of hake has been reduced from 2000 to 1750 tonnes per year in order to take into account the scientific advice from CECAF to reduce fishing mortality. However, the Agreement foresees that *"if the annual catches of these species exceed the authorized volume, a penalty of EUR 95/t would be applied for catches in excess, in addition to the fee"*.

We consider this measure to be inappropriate. If the maximum allowable catch is exceeded, even though this maximum was set for reasons of sustainability, the quantities exceeding the maximum allowable should be withdrawn the following year, in order to restore the balance in the exploitation, rather than charging this small amount which will have no deterrent effect.



The by-catches allowed for hake vessels (15% cephalopods, 5% crustaceans, and 20% other deep-sea demersal fish) are attractive to European trawlers engaged in this fishery, given their high commercial value. However, these species are also fished by artisanal fishermen. We therefore call for them to be limited as much as possible.

- **Access to tuna**

For the moment, Senegal has only two small quotas allocated by ICCAT: a quota of 417 tonnes of swordfish⁶ in the South Atlantic and 250 tonnes of swordfish in the North Atlantic zone⁷, and a quota of 50 tonnes of marlin. Senegal has no quota for other tuna species. Although the Senegalese artisanal fleets do not currently target the deep-sea tuna targeted by European fleets, the artisanal fishery catches a limited amount of tuna, and several pirogues in Dakar are trying to specialize in catching these resources.

⁸The organizations in the sector believe that it would be important to see the possibilities for developing sustainable artisanal tuna fisheries in the coming years. This would undoubtedly mean that it will be necessary for Senegal to negotiate and obtain quotas at ICCAT level in order to be able to fish these species present in Senegalese waters. It would also mean the setting up of a value chain that would allow these noble species to be developed in the best possible way.

More fish for tomorrow



⁶ <https://www.iccat.int/Documents/Recs/compendiopdf-f/2017-03-f.pdf>

⁷ <https://www.iccat.int/Documents/Recs/compendiopdf-f/2017-02-f.pdf>



Summary

EU-Senegal Protocol Fisheries Partnership Agreement

Issues and expectations of the small-scale fishing sector and civil society in Senegal.

- ACCESS TO RESOURCES

- 1) **Comply with the Convention relating to the Determination of the Minimum Conditions of Access and Exploitation of Fishery Resources** within Maritime Waters under the Jurisdiction of Member States of the Sub-Regional Fisheries Commission (SRFC) ratified in 2012 - usually referred to as the "MAC Convention" - which also takes into account the needs of sustainable artisanal fisheries in the West African sub-region.
- 2) **Positive point: No access to small pelagic**
 - (a) The sardinella resources shared between our countries are overexploited, particularly for processing into fish oil and fishmeal in the absence of joint research and management framework. The impacts on women processors and food security are catastrophic;
 - b) It is imperative to support the improvement of research on small pelagic resources (training and recruitment of investigators and scientific observers, sufficient sampling, etc) and the development, with adequate financial and human resources, of an ambitious collaboration between the research institutes of these countries of the sub-region;
 - c) Promote dialogue between researchers and professionals in the fishing sector, especially small-scale fishing, to take into account the empirical knowledge of professionals, but also to improve data on local fishing effort and catches;
 - d) The live bait used by the bait boats consists of small pelagic, mainly sardinella, which is already overexploited. This live bait fishery, generally targeting juvenile sardinella, will aggravate a currently catastrophic situation.







- **TRANSPARENCY**

1) **Protocol:** Include a specific article on the matter of general consideration, whereby Senegal would have undertaken to: *“publish all public or private agreements authorizing access to its EEZ by foreign vessels, including: the States or other entities participating in the Agreement; the period or periods covered by the Agreement; the number of vessels and types of gear authorized; the species or stocks authorized for fishing, including any applicable catch limits; the reporting, monitoring, control and surveillance measures required; and a copy of the written Agreement”.*

2) **Sectoral support:**

- Establishing transparency:

- a) On the way in which choices of activities to be financed are made as well as on the way in which expenditure is implemented;
- b) By adopting a transparency mechanism on the actions that have been carried out and the committed amounts;
- c) For the effective and efficient participation of civil society in the determination and implementation of these actions;
- d) Formalizing the publication by Senegal and the European Union, through channels accessible to the public, mainly stakeholders in the sector, of the use made of sectoral support and the actions undertaken with sectoral support money.

- Give priority to

- e) "Development of scientific capacity, research on fishery resources, and data collection";
- f) Participatory monitoring to be supported;
- g) Safety at sea through the provision of geo-location kits and life jackets, which are very useful for our fishermen.
- h) For women processors and micro fish processors, support for the improvement of their working conditions through a mechanism facilitating their access to the resource.