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Brussels, 18 December 2020

Dear Mr Notaro, Head Nature Unit DG ENV European Commission

### Concerning these two technical notes to the NADEG meeting 22 October 2020:

- 1) Biodiversity Strategy for 2030: Guidance to Member States on how to select and prioritise species/habitats for the 30% conservation improvement target under the strategy<sup>1</sup>
- 2) Draft technical note on criteria and guidance for protected areas designations<sup>2</sup>

We, the **European Anglers Alliance** warmly welcome the EU Biodiversity Strategy for 2030, not the least the minimum 25,000 km free flowing river target. Our members and volunteers will contribute to the fulfilling of the Biodiversity Strategy for 2030 the best they can.

As a member of the **CGBD and the WFD SCG expert groups** and on behalf of a membership of about **three million anglers**, we are looking forward to taking part in the streamlining of guidance documents and the implementation of the strategy's objectives and targets.

**Thousands of volunteers from our community across Europe** roll up their sleeves and put on their boots every day to take part in conservation and restoration work to improve and preserve our inland waters and the life in and around them. Much of that work would never be done without our volunteers for reason of cost implication. Without the angling volunteers there would be less healthy streams and much fewer waters in a good enough state to sustain fish life and reproduction.

#### A few quotes from the technical notes with some comments and recommendations of ours:

- "the target of 30% of the land and 30% of the sea in the EU under legal protection by 2030 should be reached by completing the Natura 2000 network and by new designations under national protection schemes"

- "...marine areas, where important gaps still exist in Natura 2000 and there are legal requirements to address them on the basis of Article 4 and the criteria in Annex III of the Habitats Directive, as well as Article 4 of the Birds Directive. In the marine environment, the requirements of the Nature Directives are complemented by those of the Marine Strategy Framework Directive, which sets the obligation to contribute to coherent and representative networks of marine protected areas, adequately covering the diversity of the constituent ecosystems, as part of the measures that Member States need to take to achieve good environmental status."

**Comments: 'Marine Protected Areas (MPAs)'** are different from inland protected areas in many respects, which should be taking duly into account when criteria and guidance are produced for identifying and designating areas. See for an example this scientific paper: "The widespread industrial exploitation of MPAs undermines global biodiversity conservation targets, elevating recent concerns about growing human pressures on protected areas worldwide."<sup>3</sup>

**We suggest that the 'ordinary' protected areas at sea (20%)** are designated close to shore. This makes it easier to monitor and control them, and to restore and conserve the biodiversity rich flat waters. This would also ease the implementation of and compliance with the above-mentioned directives (N2000, MSFD) as well as the WFD, which applies also to coastal waters.

**The 10% strictly protected areas** preferably should be placed where they are really needed or most useful. That

<sup>1</sup> <https://circabc.europa.eu/sd/a/e1a37f29-76f7-4b9a-bdbf-2b1ca98f62ff/Doc%20NADEG%2020-10-04%20Draft%20Technical%20Note%20-%20Criteria%20for%20species%20and%20habitats%20to%20be%20restored.docx.pdf>

<sup>2</sup> <https://circabc.europa.eu/sd/a/f298de23-322d-4cac-ba27-75ccabf03755/Doc%20NADEG%2020-10-03%20Draft%20Technical%20Note%20Protected%20Area%20Targets.docx.pdf>

<sup>3</sup> <https://science.sciencemag.org/content/362/6421/1403>

probably would mean designation of more than 10% area for some member states, and less than 10% for others – or in other words, the 10% should be an EU level target, not a national one.

**One big problematic issue: monitoring and control of marine protected areas are often lacking.** That is most unfortunate as poorly monitored protected areas attracts poachers. Allowing angling in as many places as possible is a cheap poaching deterrent as poachers fear people on spot with smartphones and cameras.

**Quote:** *“According to the Strategy, the Commission, together with the Member States and the European Environment Agency, will put forward criteria and guidance for identifying and designating additional protected areas, including a definition of strict protection, as well as for appropriate management planning. The Commission will aim to agree these criteria and guidance with the Member States by the end of 2021.”*

**Comments:** Indeed, definitions, not the least the definition of “strictly protected” need be further developed as well as “non-intrusive renewable energy”.

The Commission’s proposed definition excludes from strictly protected areas ‘extractive activities’ *“..such as mining, fishing, hunting or forestry,..”*, which alludes that exploitation of renewable and non-renewable resources are all the same, and that none of these activities can or should take place in a strictly protected area. In fact, globally, recreational sea angling is not banned, though restricted, in some of the existing strictly protected areas (or ‘marine reserves’) as it is regarded a low impact activity (e.g. catch and release angling).

- Read more in our position paper *“EAA position on Recreational Angling in Marine Protected Areas”*<sup>4</sup>

**For inland waters, a too rigid definition of ‘strictly protected’** combined with a forced 10% area designation presents a risk that angling will be banned unnecessarily in some places, which would be counterproductive for biodiversity, restoration and conservation of rivers, streams and lakes in these areas. Fish don’t have many friends other than anglers. Without access anglers would lose interest in these waters and spend their time, money and manpower elsewhere. The fish will be the big losers. Anglers and their organisations are those who really care about the health of fish populations, rivers and lakes. The public at large have no idea what is going on under the water surface. And to most e-NGOs fish, threatened species or not, are just another feed for other preferred animal species.

**Anglers are allowed in most N2000 areas** and often allowed to target vulnerable fish species like salmon. This is no threat to fish stocks if the angling is well-managed (adaptive management, log-books, seasonal closures etc.) as this recent scientific article tells: *“From endangered to sustainable: Multi-faceted management in rivers and coasts improves Atlantic salmon (Salmo salar) populations in Denmark”*<sup>5</sup>

**We suggest making separation** between exploitation of replenishable/renewable resources (animals and plants) versus exploitation of non-replenishable or non-renewable resources. Only rarely there is a need to ban the use of a replenishable resources, but proper management is a necessity, of course, to avoid overexploitation.

**It should be taken into account as a positive** that fish caught by anglers can be released with a high survival rate, and that angling is one of very few activities, which can generate sustainable economic activity in protected aquatic areas.

**We took note, that the Commission has been quoted for this** by the Danish news site ‘Altinget’ (10 Dec)<sup>6</sup>: *“For strictly protected areas, where the ecological requirements of protected habitats and species would need that ecological processes are left undisturbed, human activities may be restricted or excluded if they are not compatible with those requirements. This is to be decided by the national authorities on a case by case basis.”*

**Comment:** This gives us some comfort that there is, or will be, more flexibility than stated in the technical notes about ‘strictly protected areas’.

**Quote:** *“..measures for restoring such semi-open habitats with trees will not only benefit such species, but will also contribute the Biodiversity Strategy target for planting three million of new trees in the EU;”*

**We suggest planting some of these three million new trees** along small streams, which are heating up due to climate change making life impossible for many freshwater species.

With best regards,

Jan Kappel, Secretary General of the EAA  
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<sup>4</sup> [www.eaa-europe.org/positions/marine-protected-areas-2018.html](http://www.eaa-europe.org/positions/marine-protected-areas-2018.html)

<sup>5</sup> [www.researchgate.net/publication/335236300](http://www.researchgate.net/publication/335236300) From endangered to sustainable Multi-faceted management in rivers and coasts improves Atlantic salmon Salmo salar populations in Denmark

<sup>6</sup> [www.altinget.dk/miljoe/artikel/aktoerer-frygter-eu-forbud-mod-jaqt-og-fiskeri-i-beskyttet-natur-det-er-helt-ude-i-hampen](http://www.altinget.dk/miljoe/artikel/aktoerer-frygter-eu-forbud-mod-jaqt-og-fiskeri-i-beskyttet-natur-det-er-helt-ude-i-hampen)