Monsieur Jean-Louis BORLOO
State Minister
Minister of Environment, Energy, Sustainable Development and the Sea
Hôtel Roquelaure
246 Boulevard Saint-Germain
75007 Paris

Paris, 2 November 2010

Dear Minister,

In our letter dated 9 July 2010, we voice our criticisms concerning the entire process of the deep-sea fisheries mission, and our disavowal of the resulting report. Based on the final report sent to the press, we wish to reiterate our indignation, and add to our criticisms. We consider this report unworthy of the *Grenelle* Marine Consultation seal, since it offends the very principles of multi-stakeholder consultation and of governance with five different stakeholder groups. Thus, although making no mention of this fact, the report does *not* reflect the consensus or approval of the five different stakeholder groups. Publicly rejected by the panel of NGOs last July and marked by the defection of numerous participants, the process cannot claim any consensual value.

So what value does it have?
It has neither scientific nor objective value, since the report does not meet the aims set out in the mission statement, and since the care with which inconvenient statistics have been discarded, distorted or eliminated is obvious to all scientific reviewers, whose analysis of the report was extremely critical. Their comments were thus not attached to the report, or even taken into account, despite the presidency's commitments to do so.

The report's only value is its skill in hiding or distorting reality, which leads non-expert readers to draw unacceptable and ethically questionable conclusions.

After the barrage of criticism concerning the mission and the report (from both the panel of NGOs and the scientific reviewers), it was no longer possible for the reporter and the presidency not to integrate some elements, which had been too obviously left aside. In spite of this, it is to be retained that the conclusions of the report do not take into account these newly included elements. The successive paragraphs give a *seemingly* complete list of subjects relevant to deep-sea fishing, but the synthesis – that is, a true ecosystem approach - is never made. The appendices of this letter illustrate the massive inconsistencies between the content of the report and its conclusions.

Moreover, the whole report gives a distorted vision, clearly favoring the interests of the fishing industry. The data are stripped of any pertinence or power. They are carefully selected, reformulated and adapted to avoid any impact. There are countless examples, and we cite only a few.

We nevertheless hope that the chosen examples will suffice to convince you that this report is not only of poor quality, but also perverse and harmful, and in all respects unworthy of the seals of the *Grenelle* Marine Consultation and the French Republic.

The determination of the report's authors to maintain their initial conclusions, in spite of severe criticism from scientific reviewers, provides further confirmation – were this necessary – that those piloting this project had set their objectives before the work even began, that is:

- to give legitimacy to deep-sea trawling as a fishing technique;
- to ratify that this technique can be "selective", despite the majority of scientific opinions and publications showing otherwise;
- to provide legitimacy for deep-sea fishing in France;
- to attempt even to make it an exemplary model of sustainable management;
- to silence the fact that these fisheries are not profitable, in spite of substantial subsidies (even though information proving otherwise is publicly accessible);
- to create an illusion by "conceding" to conservation measures which are mere smokescreens, or to make proposals which are not even up to the standard of measures already enacted by the international community.

Given that this report has made no effort to take into account comments from researchers, despite their scientific legitimacy, we cite below some of the general remarks from one of the reviewers, Philippe Cury, concerning the report (all of his remarks were ignored).

- *"Upon reading this report, the reader cannot shape an opinion about the sustainability of deep-sea resources, since this matter is not clearly addressed. ICES and other major organizations have strong standpoints on the exploitation of deep-sea resources. The report gives the overall impression that fisheries can continue to exploit these resources with little consequence for marine ecosystems. This contradicts the current international standpoint."*

- *"As I see it, this document does not sufficiently address the issue of deep-sea fisheries, particularly their impact on the environment and on species. Moreover, current stock levels, which are below 50%-75% of original (virgin) levels for most resources, contradict statements declaring fisheries to be sustainable (those statements are based on abundance variations over recent years, which have little pertinence as regards to the real state of the resource, other than showing that levels have increased or fallen recently - this rise or fall in abundance or catch levels can be the result of changing fishing strategies, good or poor recruitment, or other factors).*

- *"How can the report envisage sustainable exploitation of certain species whilst ICES maintains the halt to targeted fisheries?"*

- *"The absence of bibliographical sources makes certain non-consensual assertions unreliable. I know that this is not a scientific document, but references, figures, data curves and tables allow to support claims."*

- *"Fishing is never envisaged from an ecosystem perspective (particularly bycatch and discards, which the analyses and discussions take into account either poorly or not at all). This is a limitation of the report's conclusions."*

In fact, only fishing professionals can celebrate this report (and they have done so) as it "limits the damage" for their fishing practices, which unfortunately, are themselves not short of damaging fisheries resources, the marine environment and public finances.

Given the remarks made here and in the accompanying appendices, we question the status that the Ministry of Environment, Energy, Sustainable Development and the Sea, along with the French government, will grant such a compromising document, and we wish to request a meeting with you in order to discuss what your plans are for this report.

With greatest respect,

Claire Nouvian
Présidente
Bloom Association

Pascal Husting
Directeur général
Greenpeace France

Cécile Ostria
Directrice générale
Fondation Nicolas Hulot pour la Nature et l'Homme

Serge Orru
Directeur général
WWF France