



Mr. Cornelius Hammer, ICES Director  
ICES Secretariat  
H. C. Andersens Boulevard 44-46  
DK 1553 Copenhagen V, Denmark

Paris, 4 June 2018

**Subject:** Information request relative to the ICES advisory process answering Dutch special request "*Comparison of the ecological and environmental effects of pulse trawls and traditional beam trawls when exploiting the North Sea sole TAC*".

Dear Mr. Hammer,

BLOOM is a non-profit organization founded in 2005 that works to preserve the marine environment and species from unnecessary destruction and to increase social benefits in the fishing sector. BLOOM runs awareness and advocacy campaigns in order to accelerate the adoption of concrete solutions for the oceans, humans and the climate, as dictated by the Sustainable Development Goals. We carry out scientific research projects, independent studies and evaluations that highlight crucial and unaddressed issues such as the financing mechanisms of the fishing sector or ecosystem impacts of destructive fishing gears.

Within this frame, BLOOM currently runs a campaign with other NGOs and artisanal fishermen to prohibit electric fishing in Europe. We undertake a rigorous scientific watch to gather all knowledge on the impacts of electric currents on marine life and fishing activities. We always welcome with great interest scientific advice and reviews produced by a renowned independent scientific institution such as ICES. We have thus been shocked by the conclusions and political use of a recent ICES scientific advice answering a special request by the Netherlands on a "*comparison of the ecological and environmental effects of pulse trawls and traditional beam trawls when exploiting the North Sea sole TAC*".<sup>1</sup>

This special request by the Netherlands has been timed and framed to enable scientific legitimization of a destructive fishing gear, while Trilogue negotiations determining its future are underway at the European level. This advice now being part of the European political debate, we believe complete transparency is needed on the advisory process that led to its production.

We have identified in the ICES meeting calendar and ICES reports the different steps leading to this advice:

- "*WGECO was tasked to prepare a list of topics to be considered by WGELECTRA, at its meeting from 17-19th of April, related to a request from the Dutch Ministry of Agriculture, Nature and Food Quality regarding a comparison of the ecological and environmental effects of traditional beam and pulse trawls. [...] WGECO nominated two of its members to participate in the ADGPULSE meeting from 16-18 May*".<sup>2</sup>
- A review group composed by Jake Rice and two members of WGECO (Stefán Áki Ragnarsson, Håkan Wennhage) assessed if information produced and gathered by WGELECTRA enabled to answer the Dutch special request. The technical minutes are available in the last WGELECTRA report (Annex 5)<sup>3</sup> and the ICES meeting calendar indicates that the meeting was done by correspondence on 08 May 2018.<sup>4</sup>

<sup>1</sup> [www.ices.dk/sites/pub/Publication%20Reports/Advice/2018/Special\\_requests/nl.2018.08.pdf](http://www.ices.dk/sites/pub/Publication%20Reports/Advice/2018/Special_requests/nl.2018.08.pdf)

<sup>2</sup> [www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2018/WGECO/wgeco\\_2018.pdf](http://www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2018/WGECO/wgeco_2018.pdf)

<sup>3</sup> <http://ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/EOSG/2018/WGELECTRA/WGELECTRA%20Report%202018.pdf>

<sup>4</sup> [www.ices.dk/news-and-events/meeting-calendar/Pages/ICES-CalendarDisp.aspx?sd=c3e53a4d-f016-e811-80ca-00155d2cc03b](http://www.ices.dk/news-and-events/meeting-calendar/Pages/ICES-CalendarDisp.aspx?sd=c3e53a4d-f016-e811-80ca-00155d2cc03b)



- The Advice Drafting Group gathered in ICES headquarters in Copenhagen from 16 May to 18 May 2018. The meeting was chaired by Mark Tasker.<sup>5</sup>
- A web-conference chaired by Mark Tasker was organized on 25 May 2018 for ACOM to finalize the advice.<sup>6</sup>
- Finally, the ICES advice was released on 30 May 2018.

Within this process, three elements remain unclear:

- When did the Netherlands formulate their special request for an ICES scientific advice?
- Who was present at the Advice Drafting Group organized at the ICES headquarters? Is a report of this meeting available to better understand the drafting process?
- Who was present during ACOM meeting and is a report of this meeting available?

These elements are important to shed full light on the advisory process, which resulted in shocking conclusions immediately used by Dutch politicians to make electric fishing seem acceptable. We thus formally ask you to make publicly available in a timely manner any information answering above questions.

Finally, we have been highly surprised by the conclusions of the ICES advice. As detailed in the ICES advice basis,<sup>7</sup> *"ICES advisory approach is based on an ecosystem approach, within a precautionary approach to management. [...] This implies that as information becomes increasingly limited and/or less certain, ICES advice on management will be more conservative with respect to possible impact on the marine ecosystem."* In fact, your *"aim is to address the request while ensuring that the advice is consistent with maintaining healthy marine ecosystems."* Far from being precautionous, the ICES advice conclusion is that *"there are fewer ecological and environmental effects of using pulse trawls than traditional beam trawls when exploiting the total allowable catch (TAC) of North Sea sole."*

We invite you to read our online critic of this ICES advice, and formally ask you to reconsider it in view of the principles it should be based on. This advice is currently being used by the Dutch government to defend this fishing technique,<sup>8</sup> despite a clear lack of knowledge and management. ICES cooperation in this political maneuver is of deep concern, since it jeopardizes the scientific credibility of the advisory process. We remain at your disposal to further discuss the scientific conclusions of this advice.

I look forward to receiving your reply at your earliest convenience. Please accept the assurances of my highest consideration.

Dr. Mathieu Colléter  
BLOOM, 'Science & Policy' officer

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<sup>5</sup> [www.ices.dk/news-and-events/meeting-calendar/Pages/ICES-CalendarDisp.aspx?sd=b5f7218e-4a12-e811-80ca-00155d2cc03b](http://www.ices.dk/news-and-events/meeting-calendar/Pages/ICES-CalendarDisp.aspx?sd=b5f7218e-4a12-e811-80ca-00155d2cc03b)

<sup>6</sup> [www.ices.dk/news-and-events/meeting-calendar/Pages/ICES-CalendarDisp.aspx?sd=64320ab0-f116-e811-80ca-00155d2cc03b](http://www.ices.dk/news-and-events/meeting-calendar/Pages/ICES-CalendarDisp.aspx?sd=64320ab0-f116-e811-80ca-00155d2cc03b)

<sup>7</sup> [www.ices.dk/sites/pub/Publication%20Reports/Advice/2016/2016/Introduction\\_to\\_advice\\_2016.pdf](http://www.ices.dk/sites/pub/Publication%20Reports/Advice/2016/2016/Introduction_to_advice_2016.pdf)

<sup>8</sup> [www.nu.nl/ondernemen/5290859/minister-schouten-verwacht-verbod-pulsvisserij-af-kunnen-wenden.html](http://www.nu.nl/ondernemen/5290859/minister-schouten-verwacht-verbod-pulsvisserij-af-kunnen-wenden.html)