



Mechelen, 15 maart 2013

Aan dhr. Peter Broeckx , voorzitter VLAM
CC dhr. Eddy Landuyt, afgevaardigde van de stuurgroep visserij (VLAM)

Betreft: VLAM promoot kritiek bedreigde en Europees beschermde doornhaai – verzoek tot overleg

Contacten: Frederik Mollen, dienst beleid NP, frederik.mollen@natuurpunt.be, tel. 015 29 72 62
Katrien Vandevelde, coördinator haaienproject SFF, katrien.vandevelde@seafirst.be
Sabien Leemans, sabien.leemans@wwf.be, Franck Hollander franck.hollander@wwf.be

Geachte heer de voorzitter,
Geachte stuurgroepafgevaardigde visserij,

Van nature komen er een 20-tal haaien en roggen voor in het Belgische deel van de Noordzee. Ingevolge de intensieve visserij prijkt een kwart van deze soorten als *critically endangered* op de internationale rode lijst ¹. Dit betekent dat deze soorten in hun voortbestaan ernstiger zijn bedreigd dan vb. de ijsbeer (*vulnerable*) of reuzenpanda (*endangered*).

Gezien hun preciaire situatie, geldt binnen Europa een totaal vangstverbod voor al deze soorten. Via een achterpoortje (vb. Noorwegen is geen EU lid), belanden deze soorten alsnog op de Belgische markt. Tevens stellen wij vast dat VLAM één van deze soorten, met name de doornhaai (*Squalus acanthias*), actief promoot voor consumptie. Dit blijkt uit verschillende van uw communicatie-instrumenten zoals website, affiches, en op internationale handelsbeurzen (zie bijlagen).

Natuurpunt, Sea First Foundation (SFF) en het WWF vinden deze promotie ongepast en stellen ons de vraag op welke wetenschappelijke basis vissoorten al dan niet door VLAM worden gepromoot?

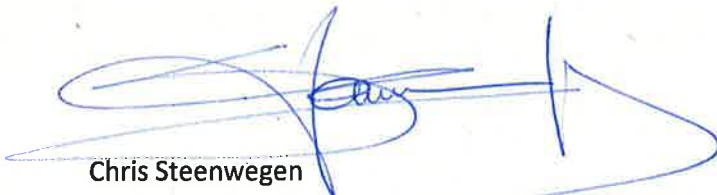
¹ *Critically endangered* - IUCN red list (2012): engelhaai (*Squatina squatina*), haringhaai (*Lamna nasus*), doornhaai (*Squalus acanthias*), vleten (*Dipturus batis*, *D. cf. flossada*, *D. intermedia*).

Graag overleggen wij met uw diensten over het schrappen van deze soort uit uw campagnes, en desgevallend de positieve communicatie die wij hierover samen kunnen voeren naar het grote publiek.

Samen met Horeca Vlaanderen communiceerden wij in 2012 met succes naar 30.000 horecazaken over een soortgelijk probleem, dat van de haringhaai. Wij bekijken graag of we een dergelijke actie ook met VLAM kunnen opzetten.

Wij zijn steeds bereid uw verder te informeren en kijken alvast uit naar uw antwoord.

Met oprechte hoogachting,



Chris Steenwegen
Directeur Natuurpunt
Mede namens SFF en WWF

Bijlagen:

1. Uittreksel IUCN red list voor doornhaai (NE Atlantic)
2. Historiek van het Europees visserijbeleid voor doornhaai
3. Uittreksel www.visinfo.be met foto en tekst over doornhaai
4. Affiche VLAM (met doornhaai) zoals door uw verspreid op European Seafood Expo (2012)

Bijlage 1 – Uittreksel IUCN red list doornhaai *Squalus acanthias* (NE Atlantic)

The IUCN Red List of Threatened Species™ 2012.2

Enter Red List search term(s) OTHER SEARCH OPTIONS

Home > [Squalus acanthias \(Northeast Atlantic subpopulation\) \(Cape Shark, Piked Dogfish, Spurdog\)](#)

Squalus acanthias (Northeast Atlantic subpopulation)

VIEW MAP

NOT EVALUATED	DATA DEFICIENT	LEAST CONCERN	NEAR THREATENED	VULNERABLE	ENDANGERED	CRITICALLY ENDANGERED	EXTINCT
NE	DD	LC	NT	VU	EN	CR	EX
						CR	

[Summary](#) [Classification Schemes](#) [Images & External Links](#) [Bibliography](#) [Full Account](#)

Taxonomy [top]

America workshops (Shark Red List Authority)

Contributors:

Justification:
 The spiny dogfish or spurdog *Squalus acanthias* is a small demersal shark of temperate continental shelf seas worldwide. Most stocks are highly migratory, but there is no regional fisheries management for the species. Management is in place in only a few range states and in only a limited part of the range of highly migratory stocks. Although naturally abundant, this is one of the more vulnerable species of shark to over-exploitation by fisheries because of its late maturity, low reproductive capacity, longevity, long generation time (25–40 years) and hence a very low intrinsic rate of population increase (2–7% per annum). Population segregation and an aggregating habit make mature (usually pregnant) females highly vulnerable to fisheries even when stocks are seriously depleted. This aggregating habit also means that catch per unit effort (CPUE) is not an adequate indicator of stock status; high CPUE can be maintained even when populations are severely depleted. Some targeted *Squalus acanthias* fisheries have been documented for over 100 years. Fisheries stock assessments report a decline in total biomass of >85% from baseline in the Northeast Atlantic, where catch effort is effectively unlimited. Mediterranean and Black Sea stocks are also unmanaged, with a >80% decline reported in a Black Sea stock assessment for 1981–1992. There has been a decline in biomass of mature females of 75% in just 10 years in the Northwest Atlantic, where US federal efforts to manage the stock are hampered by high bycatch, continued exploitation in Canadian Atlantic waters, and regular defiance of scientific advice by US Atlantic states. European demand continues to fuel markets around the world. Fisheries and population trend data indicate that the southern part of the Northeast Pacific stock has also declined through overfishing, but stocks appear stable off Alaska. The only data identified from the Northwest Pacific are from Japan, where landings of spurdog declined ~80% in 1952–1965, and inshore spurdog CPUE declined 80–90% from the mid 1970s to late 1990s. Unregulated and expanding target and bycatch fisheries take spiny dogfish in South America (Europe reports imports from this region), where population declines are reported. New Zealand manages the species, which is taken in target and bycatch fisheries, through its Quota Management System. There is only limited fishing pressure in Australia and South Africa, with most catches discarded.

History:
 2003 – Endangered (IUCN 2003)
 2003 – Endangered

Geographic Range [top]

Countries:

Native:
 Belgium; Denmark; Faroe Islands; Germany; Iceland; Mauritania; Morocco; Netherlands; Norway; Portugal (Azores, Madeira); Russian Federation; Senegal; Spain (Canary Is.); Sweden; United Kingdom; Western Sahara

FAO Marine Fishing Areas:

Native:
 Atlantic – eastern central; Atlantic – northeast

Bijlage 2 – Historiek visserijbeleid en doornhaai *Squalus acanthias* (website Shark Alliance)

The Issue

Under the current EU Common Fisheries Policy, catch limits for fishermen, in the form of total allowable catches (TACs) or full prohibitions on retention, are proposed by the European Commission and agreed by the EU Council of Fisheries Ministers. All commercially important fish are supposed to be managed and all depleted species are meant to have recovery plans. EU fishery managers are provided with scientific advice based on the work of scientists from the International Council for Exploration of the Sea (ICES). Catch limits are set annually for most fish populations and every two years for deep-sea species.

The EU is gradually protecting more threatened shark and ray species and bringing more shark and ray species under quotas. These regulations, however, have come late and do not all cover the full ranges of threatened species. Much EU shark fishing remains unregulated.

Commitments

Through the EU Shark Action Plan, and in more general commitments, the European Commission has pledged to end overfishing of sharks and set fishing limits in a more precautionary manner, based on scientific advice. The Plan, which has been endorsed by the EU Council of Fisheries Ministers, also calls for a reduction in bycatch and the limiting of fishing to protect endangered species.

Progress since 2006

In December 2006, the EU Council of Fisheries Ministers rejected a proposal from the European Commission to limit catch of porbeagle sharks at 240 tonnes (t) and left the fishery unregulated. Ministers agreed to reduce the TAC for spurdog in the North Sea by 20 percent and established another spurdog TAC (2,828t) for other parts of the northeast Atlantic, starting in 2007. These measures fell far short of the ICES advice for no fishing on either species.

In late 2006, the EU Fisheries Council also prohibited the fishing, retaining, transshipping and landing of basking and white sharks, following their listing under the Convention on Migratory Species.

The first reductions in TACs for exceptionally vulnerable deep-sea sharks came into effect in January 2007, in line with a previous EU Fisheries Council agreement to phase out fishing of these species.

In December 2007, the Fisheries Council set the first EU TAC for Atlantic porbeagle sharks at 581t (substantially higher than the 422t proposed by the Commission) for 2008. Ministers also reduced the 2008 TACs for Atlantic spurdog, skates and rays by 25 percent, as proposed by the Commission.

The Council further reduced the deep-sea shark TAC in November 2008.

In December 2008, the EU Fisheries Council failed to heed Commission advice to close porbeagle and spurdog fisheries and instead reduced TACs by 25 percent and 50 percent, respectively. Ministers balanced this reckless decision with agreements to ban retention and mandate careful release of common skates, angel sharks, undulate rays, and white skates, starting in 2009.

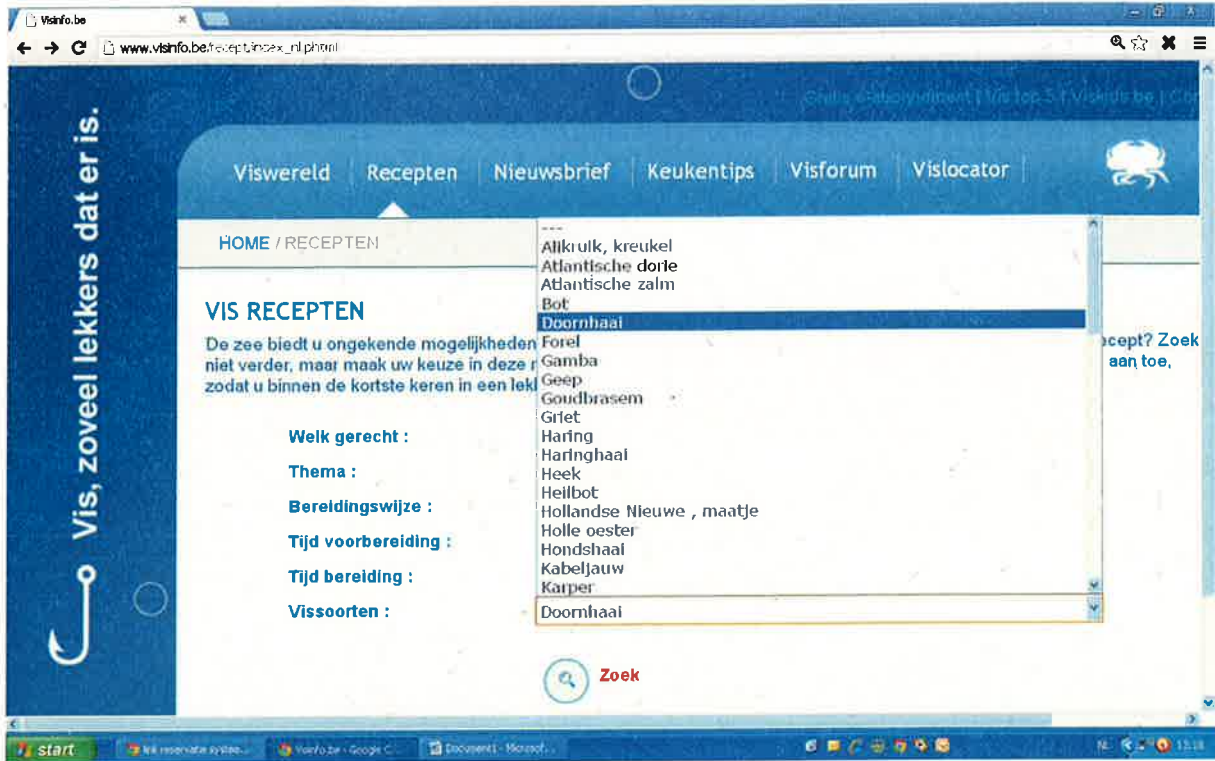
In December 2009, the Fisheries Council agreed both to end fishing for porbeagle sharks in the Atlantic through a zero TAC and to effect a ban on EU vessels taking the species from international waters. Ministers also reduced spurdog fishing quotas by 90 percent, starting in 2010.

In November 2010, the Council adopted a Commission proposal to add four species to the deep-sea shark fishery closure (frilled shark, six-gill shark, sailfin roughshark and knifetooth dogfish) and finally set the deep-sea shark TAC at zero, starting in 2012.

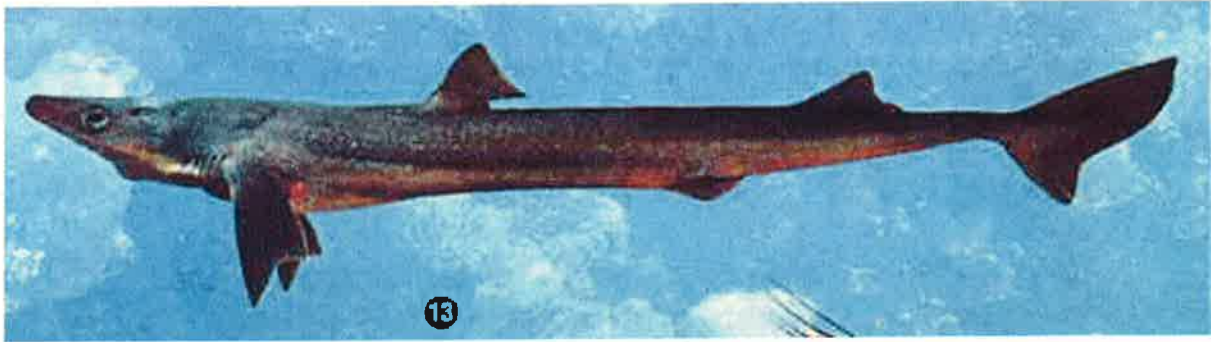
In December 2010, the Council followed through on a commitment to set the spurdog TAC at zero, maintained the porbeagle fishery closure for 2011, reduced quotas for skates and rays, limited longline fishing for tope sharks, and protected Atlantic (but not Mediterranean) guitarfish.

In August 2011, the European Commission proposed extending the porbeagle measures to all EU waters, including those in the Mediterranean.

Bijlage 3 - Printscren www. visinfo.be (d.d. 22 februari 2013) te bereiken via website VLAM, met zowel op foto als tekst de kritiek bedreigde doornhaai *Squalus acanthias*



Bijlage 4 – Folder VLAM, met financiële steun EU, zoals o.a. verspreid op haar stand te European Seafood Exposition te Brussel (2012), met op nummer 13 de kritiek bedreigde doornhaai *Squalus acanthias*



Délices
DE LA MER DU NORD

www.poisson.vlam.be

1 Saumon
 2 Maquereau
 3 Suren
 4 Aiglefin, Morue
 5 Thon
 6 Lot blanc, Lot blanc
 7 Merlu
 8 Cabillaud, Merlu
 9 Vire
 10 Loin blanc, Loin
 11 Merlan
 12 Langoustine
 13 Epinefile
 14 Coquilles Saint-Jacques
 15 Moules Marinières
 16 Homard
 17 Crustacés
 18 Crevettes
 19 Langoustines
 20 Coquilles Saint-Jacques
 21 Homard
 22 Crustacés
 23 Crevettes
 24 Coquilles Saint-Jacques
 25 Homard
 26 Crustacés
 27 Crevettes
 28 Coquilles Saint-Jacques
 29 Homard
 30 Crustacés
 31 Crevettes
 32 Coquilles Saint-Jacques
 33 Homard
 34 Crustacés
 35 Crevettes
 36 Coquilles Saint-Jacques
 37 Homard
 38 Crustacés
 39 Crevettes
 40 Coquilles Saint-Jacques
 41 Homard
 42 Crustacés
 43 Crevettes
 44 Coquilles Saint-Jacques
 45 Homard
 46 Crustacés
 47 Crevettes
 48 Coquilles Saint-Jacques
 49 Homard
 50 Crustacés
 51 Crevettes
 52 Coquilles Saint-Jacques
 53 Homard
 54 Crustacés
 55 Crevettes
 56 Coquilles Saint-Jacques
 57 Homard
 58 Crustacés
 59 Crevettes
 60 Coquilles Saint-Jacques
 61 Homard
 62 Crustacés
 63 Crevettes
 64 Coquilles Saint-Jacques
 65 Homard
 66 Crustacés
 67 Crevettes
 68 Coquilles Saint-Jacques
 69 Homard
 70 Crustacés
 71 Crevettes
 72 Coquilles Saint-Jacques
 73 Homard
 74 Crustacés
 75 Crevettes
 76 Coquilles Saint-Jacques
 77 Homard
 78 Crustacés
 79 Crevettes
 80 Coquilles Saint-Jacques
 81 Homard
 82 Crustacés
 83 Crevettes
 84 Coquilles Saint-Jacques
 85 Homard
 86 Crustacés
 87 Crevettes
 88 Coquilles Saint-Jacques
 89 Homard
 90 Crustacés
 91 Crevettes
 92 Coquilles Saint-Jacques
 93 Homard
 94 Crustacés
 95 Crevettes
 96 Coquilles Saint-Jacques
 97 Homard
 98 Crustacés
 99 Crevettes
 100 Coquilles Saint-Jacques