

## **Declaration of the first German Fishing Tourist Agencies Board Meeting**

Regarding forslag til endring av regler om turistfiske, Ref. 19/7110-2, 6th of January 2020

The Interest Group of German Fishing Tourist Agencies consists of seven of the biggest agencies in Germany (Andree's Angelreisen, Angelreisen K&N.Berlin OHG, Angelreisen Teltow, DinTur Reisevermittlung GmbH, Heilhornet Angelreisen Inh. Claudia Günnemann, Kingfisher Reisen and Vögler's Angelreisen GmbH) and send each year approximately 80.000 Anglers to Norway (appr. 800.000 annual nights). We support the idea of a sustainable fishing tourism and are concerned about people in Norway who do not care about rules and regulations. With our experience of more than 40 years of fishing tourism we would like to share our knowledge and comment the proposal chronological:

### **§ 2. Utførselsregulering**

The interest group supports the proposal to generally prohibit the export quote of sea fish from unregistered fishing destinations along the Norwegian coast. If the export quote of fish is restricted to the registered fishing destinations (currently around 1100 companies), in our opinion this has unconditional positive effects, not only for the fishing tourist and the operator of a registered destination, but also in terms of sustainability for the fish stocks and for the authorities that control the removal.

The interest group does not support the proposal to limit the export quota per angler to once per year. We observe an increasing tendency of our guests to travel to Norway two or three times a year, as a group with other anglers and additionally as a summer vacation with the family, which is also welcome from the Norwegian side. To encourage this travel pattern, we suggest limiting the number of visits to three visits per calendar year with at least 30 days between each export.

The interest Group is very concerned about the suggestion to restrict the transport of fish to round fish only. This would have several negative consequences for all fishing tourists, for all (registered) fishing destinations in Norway and also for airlines, ferries and local actors like gas-stations, shops etc..

#### **The main reasons:**

- a. The handling and transport of 20 kg round fish on the return journey by plane and specially ferry is hardly possible or only with great logistical effort and additional cooling on the return journey.
- b. Fish with a round weight of more than 20 kg cannot be used at all, as it would be illegal to cut them into pieces for several people in the travel group.
- c. In terms of sustainability, it is not rational that fish waste (bones etc. after filleting) has to be transported over great distances with a lot of effort. The waste should be brought back into the open sea to benefit the nature, as several and endangered species of seabirds use fish waste as food.

- d. Filleting or cutting thawed fish at home is difficult and leads to high processing losses. Another problem is that once thawed fish has to be completely used immediately.

### **§ 3. Rapportering av fangst**

The interest group supports the proposal of a regular and frequent reporting rate. Due to potential poor cellular connections, different reporting methods, downtime on the Internet and non-regular fishing trips, we recommend a weekly report. The catch should be reported no later than 7 days after the catch.

### **§ 4. Informasjon**

The interest group is highly aware of their own responsibility and is obliged to provide their guests with easily understandable information about all the rules and laws that increase the sustainability of fishing tourism. This can be done, for example, with image video instructions on how to handle catch (filleting, etc.) properly, which every tour operator should publish in the future. We advocate an extensive dialogue with guests, fishing facilities and also with the Norwegian authorities. An even closer cooperation between fishing providers and fishing facilities should be sought in order to prevent violations of the existing laws or to pass them on to the authorities.

### **Time to implement new rules**

The interest group ask and hope that the final regulations will not apply to the 2020 season, as most fishing tourists have already booked for the year 2020, assuming that the conditions for tourist fishing remain unchanged. Given the relatively recent changes in the law, we believe it is now important to find long-term solutions that offer predictable working conditions to those involved in sea fishing tourism.

### **Conclusion**

**We are convinced that the current registration system and the export quote of 20 kg of fish fillet per person in combination with the changes advocated above represent a good and sustainable solution for the coexistence of fishing tourism, fishing industries in Norway and the sustainable use of fish stocks along the Norwegian coast.**

**In particular, the proposal to limit the export quote to whole round fish would, on the other hand, lead to considerable losses in fishing tourism and sustainably harm all participants involved (tour-operators, fishing guests, fishing destinations, airlines and ferry companies as well as the infrastructure on the coast). This will not solve the most pressing problems, such as the illegal export of fish.**

**Finally at the end of our declaration we would like to recommend: start into a productive discussion in consideration of the utilization decree.**



Vögler's Angelreisen GmbH



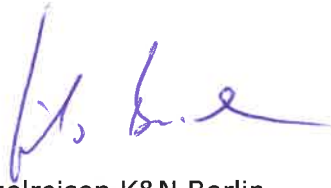
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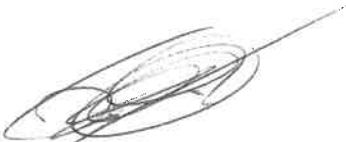
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