



Pelagic RAC  
Treubstraat 17  
PO Box 72  
2280 AB Rijswijk  
The Netherlands

Tel: +31 (0)70 336 9633  
Fax: +31 (0)70 399 3004  
E-mail: [info@pelagic-rac.org](mailto:info@pelagic-rac.org)  
<http://www.pelagic-rac.org>

European Commission  
Directorate General Fisheries  
Att. Mr. Jörgen Holmquist  
Rue de la Loi 200  
B 1049 Brussels  
BELGIUM

Date: 20 November 2006  
Our reference: PRAC06.32/IH  
Subject: Input technical measures

Dear Mr. Holmquist

In response to the latest non-paper on Technical Measures for the North-east Atlantic and North Sea of July 21<sup>st</sup> 2006, the Pelagic RAC is pleased to put forward its views.

The paper contains two key areas with regard to the pelagic fishery: mesh size and simplification. Regarding the first issue, neither the setting of minimum nor maximum mesh sizes makes sense in the pelagic fishery. The nets are chosen on the basis of the stock being targeted to avoid fish getting trapped in the meshes ('meshing') and ensure that the net will have adequate speed.

The protection of juveniles is an important issue, but already being accommodated in other, existing regulations and measures - for example through the establishment of closed areas. In the pelagic fishery, small meshes are not the appropriate measure to protect juveniles. Selectivity is best achieved through the use of the latest bridge technology, including high frequency sonar equipment, to give good definition of shoals.

The Pelagic RAC therefore recommends abandoning the point of mesh size in the non-paper.

Regarding simplification, the document is very general and unfortunately the specific technical measures are defined in other Commission Regulations. For those who have to apply these measures and work with in every day life, the document is therefore not very clear and practical. The Pelagic RAC therefore recommends putting together one document that contains all measures.

We sincerely hope that you would take our views into account when discussing this document further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ingvild', with a long horizontal stroke extending to the right and a small mark below it.

Ingvild Harkes

Pelagic RAC secretariat

c.c. Mr Reinhard Priebe, Mr Kenneth Patterson, Mr Emmanouil Papaioannou, Mr Poul Degnbol, Ms Miriam Garcia-Ferrer.