



European Commission
Directorate-General Fisheries
c/o Mr Briens
fisheries-control-consultation@ec.europa.eu

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Date: 06 May 2008
Our reference: PRAC0823/AC
Subject: Response to consultation on the initiatives proposed by the Commission to modernise and reform the control system of the Common Fisheries Policy

Dear Mr Briens,

The Pelagic RAC is pleased to be afforded the opportunity to submit its views on the initiatives proposed by the Commission to modernise and reform the control system of the Common Fisheries Policy. We are aware that a number of different organisations and committees are submitting views to the Commission on this issue. Some of the members of the Pelagic RAC are also members in these organisations and committees, therefore the Pelagic RAC has decided to concentrate on the key principles it considers should be the basis for a new policy framework, rather than commenting on each of the specific nine objectives. The Pelagic RAC considers that the new policy framework should be based on the following key principles:

SIMPLIFICATION OF THE RULES

The present set of rules is complex, difficult to understand and is spread over twenty regulations, which causes difficulty in complying. The Pelagic RAC considers that simplification of the rules which are stakeholder proofed is essential in any new policy framework.

RATIONALISATION OF RULES

The Pelagic RAC considers that it is very important that rules be rationalised in order to ensure that the rules make sense from a stock conservation standpoint and that the stakeholders can understand the relevance. One particular detail in relation to rationalisation of the rules that the Pelagic RAC considers should be amended is the margin of tolerance of 10% used to estimate quantities of pelagic species on board the vessel. The Pelagic RAC questions the need for this strict rule on the estimates as it is not used in establishing the final weighed quantity. This is putting an unnecessary burden on the fishermen to no avail.

LEVEL PLAYING FIELD AND HARMONISATION OF SANCTIONS

The Pelagic RAC considers that, in general, most stakeholders do not consider that a level playing field exists throughout the EU in terms of fisheries control. In this regard the Pelagic RAC would very much welcome the development of a level playing field that gives confidence to all stakeholders that it does exist throughout the EU. In addition the Pelagic RAC considers that every effort should be made to harmonise sanctions and to introduce administrative sanctions in certain circumstances.

CULTURE OF NATURAL COMPLIANCE

The best way to achieve a culture of natural compliance is to have a grassroots approach building on the control systems with the input of all the stakeholders. This in the Pelagic RAC's view is an essential ingredient in developing an effective, efficient and strongly supported control system.

In conclusion, the Pelagic RAC is of the opinion that this is a good opportunity to make the control measures efficient and effective towards the long term sustainability of resources and competitiveness of the EU fleet.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Aukje Coers', written over a horizontal line.

Aukje Coers
Pelagic RAC secretariat

c.c. Isabelle Viallon