Dear Ms Colliander,

After having dealt with the landing obligation for pelagic fisheries for more than a year the Pelagic AC has identified a number of issues that it believes should be addressed by the Scheveningen Group to further enable the implementation of the landing obligation in such a way that unnecessary costs can be avoided while at the same time adding value to unwanted catches. The Pelagic AC would therefore like to kindly ask the Scheveningen Group to consider the following issues when amending the discard plan for the North Sea:

1) **Processing plant on-board pelagic vessels**
   The Pelagic AC recommends that the possibility to install processing plants on-board pelagic vessels should be granted as long as the following two conditions are being met: firstly, full documentation of the catch entering the processing plant must be guaranteed to ensure that no endangered, threatened or protected species will end up in the processing plant. Secondly, the same quality and regulatory requirements that apply to fish processing plants onshore should apply to fish processing plants on-board.

2) **Abolishment of catch composition rules**
   Under the landing obligation catch composition rules in pelagic fisheries, e.g. the so-called “mackerel box” are no longer relevant and should therefore be abolished.

3) **Survivability exemptions in purse-seine fisheries**
   The Pelagic AC strongly recommends that survivability exemptions in purse-seine fisheries are being implemented in the same way in all areas. This requires coordination among the Scheveningen group, the NWW group and the SWW group. While in the North Sea it is mandatory to attach a buoy to the purse-seine, this is not a requirement in other areas. The Pelagic AC recommends that this rule, and potentially other rules, are being aligned.
I hope that you find the above listed recommendations helpful when amending the discard plan for the North Sea. A further recommendation on the handling of damaged fish might be sent in the near future, but at this point is still subject to agreement by the Executive Committee.

In case you have any questions please do not hesitate to contact the secretariat.

Yours sincerely,

Ian Gatt
Chairman Pelagic AC