

Mr Joao AGUIAR MACHADO
Director General
Directorate General Maritime Affairs
and Fisheries
Rue de la Loi 200
1049 Brussels
BELGIUM

Pelagic AC
Louis Braillelaan 80
2719 EK Zoetermeer
The Netherlands

Tel: +31 (0)63 375 6324
E-mail: info@pelagic-ac.org
<http://www.pelagic-ac.org>

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Subject: Consultation on fishing opportunities 2017

Dear Mr Aguiar Machado,

The Pelagic Advisory Council (AC) appreciates the opportunity to comment on the “Consultation on the fishing opportunities for 2017 under the Common Fisheries Policy” that also includes a report on the introduction of the landing obligation. Please find below the Pelagic AC’s comments on those sections relevant for stocks under the remit of the Pelagic AC.

Multiannual management plans

The Pelagic AC concurs with the Commission that the agreement reached on a multiannual plan for Baltic stocks marks a breakthrough in implementing the Common Fisheries Policy (CFP), which stipulates that the development of such plans is a priority.

As you are well aware the Pelagic AC has always considered the development of multiannual management plans for the stocks under its remit as one of its core activities. As a result the Pelagic AC has a long record of successfully developing such plans in close collaboration with fisheries scientists.

This year’s consultation document states that *“the Commission will accelerate the development of proposals for multiannual plans for other EU sea basins”*. While the Pelagic AC strongly supports the initiative of developing multiannual management plans it also would like to emphasize the importance of properly including stakeholders in the process; from conception to final result. Especially in regards to pelagic stocks the Pelagic AC has extensive experience in developing such plans and therefore constitutes a useful resource for the Commission to draw from. At the same time, involving Advisory



Councils during every stage of the process will ensure that future plans meet stakeholders' needs and enjoy strong support from the fishing community thereby achieving a great level of compliance.

2017 proposals for Total Allowable Catches (TACs)

The Pelagic AC generally welcomes the Commission's intention to set TACs in 2017 in line with achieving MSY in 2017. However, there might be specific stocks for which setting a fishing mortality not equalling F_{msy} could be desirable, namely in cases where a management strategy has been developed that enjoys the support of all relevant stakeholders. Very concretely this situation applies to Celtic Sea herring (ICES divisions 7a South of 52°30' North, 7g-h and 7j-k) where the target fishing mortality of the management strategy developed by the Pelagic AC is lower than the F_{msy} value. In other cases, however, it might be warranted to adjust the target fishing mortality of a management strategy to align it with the MSY objective.

For stocks lacking scientific advice the Commission intends to apply the precautionary approach in a systematic, predefined and transparent way. However, like last year, no information is provided on how such an application will be defined and the Pelagic AC would like to ask the Commission again to present more details on the application of the precautionary approach.

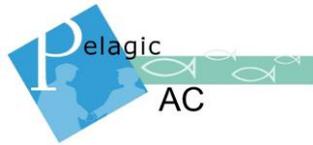
Northeast Atlantic pelagic stocks

The consultation document falls short on describing the difficult management situation for a number of Northeast Atlantic pelagic stocks, i.e. blue whiting, Northeast Atlantic mackerel and Atlanto-Scandian herring. The Pelagic AC would have appreciated more reflection on the situation, especially in regards to how the Commission intends to secure international agreements that meet CFP requirements.

Report on the implementation of the landing obligation

On page 9 of the consultation document the Commission states that *"at this early stage, no significant difficulties or major impacts on the fishing operations under the pelagic and Baltic landing obligation have been reported"*. While the Pelagic AC agrees with this conclusion it is nevertheless important to emphasize that problems are being encountered and that solutions must be sought. Neglecting even minor problems can in the long run lead to significant issues in regards to compliance and jeopardize a level-playing field. It is therefore essential that all parties involved, i.e. the Commission, the Member States and stakeholders, adopt an open attitude and closely collaborate to master the challenges ahead. In this regard the Pelagic AC strongly recommends that the recent workshop organized by the Pelagic AC and hosted by the Commission on implementation problems will be supported and continued in the future.

Finally, we would like to remark that just like last year the role of the Advisory Councils is hardly mentioned in the consultation document, despite them being the main stakeholder body providing advice on the management of fish stocks exploited by the EU fleet and their enhanced role in the new CFP. We therefore would like to see their role acknowledged more explicitly in the next consultation document on fishing opportunities.



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

Kind regards,

A handwritten signature in black ink that reads "Ian Gatt" with a stylized flourish underneath.

Ian Gatt
Chairman Pelagic AC

