

**Ms Sara Colliander**  
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Division for Fisheries, Game Management  
and Reindeer Husbandry  
Ministry of Enterprise and Innovation  
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Date: 7 December 2016  
Our reference: 1617PAC/ 26  
Subject: Scheveningen Group work program 2017

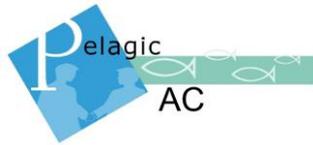
Dear Ms Colliander,

Thank you very much for your letter of 22 November 2016 and the work program of the Scheveningen Group. We greatly appreciate this timely submission. We also welcome that you state in the work program that the Scheveningen Group intends to evaluate the pelagic discard plan with the Pelagic AC and we therefore understand that the consultation process will be a continuous two-way process rather than a consultation after possible amendments have already been drawn up. This is in accordance with our previous recommendations on how we envisage the consultation process.

We would, however, like to emphasize once again that the pelagic discard plan in the North Sea must not be dealt with in isolation from the pelagic discard plans in the North Western Waters and the South Western Waters. Especially in regards to widely distributed stocks it is crucial that fishermen in all areas are subject to the same regulations when fishing the same stock. Any deviation from this principle would undermine the level-playing field. In this regard we also regret to inform you that we have not received any requests from the North Western Waters regional group nor the South Western Waters regional group to provide recommendations on potential amendments to the pelagic discard plans in the North Western Waters and South Western Waters respectively.

In your work program you seek advice by the Pelagic AC and the North Sea AC on a number of issues, e.g. lessons learned, minimum conservation reference sizes and inter-species flexibility. The timeframe for the consultation is set to February 2017 with the possibility for the North Sea AC to provide further advice during 2017. It comes as a surprise to the Pelagic AC that such an opportunity is specifically granted to the North Sea AC, but not the Pelagic AC and we therefore kindly request that the work program will be adjusted accordingly. We would also like to point out that the next Pelagic AC meeting will take place on 28 February 2017 in The Hague and advice from the Pelagic AC will therefore be submitted by mid-March 2017.





Another subject included in the Scheveningen Group's work program is a "choke species action plan" to be developed in close collaboration with the North Sea AC. In recent months it became apparent that demersal bycatch in pelagic fisheries could create choke situations in pelagic fisheries as well. Therefore, the Pelagic AC has recently submitted a recommendation on the use of footnotes in the TAC and Quota Regulation to mitigate such situations. Taking this into account we believe that the Pelagic AC should also be included in developing a "choke species action plan".

Finally, the meetings table at the end of the work program only includes advice of and consultations with the North Sea AC. The Pelagic AC is not mentioned once in this table. Assuming this to be an error we would appreciate the table to be amended.

Sincerely,

A handwritten signature in blue ink that reads 'Jesper Raakjær'.

Jesper Raakjær  
Chairman Pelagic AC

