

**Mr Joao AGUIAR MACHADO**  
Director General  
Directorate General Maritime Affairs and  
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Date: 28 April 2017  
Our reference: 1617/PAC 89  
Subject: Re-allocation of the EMFF

Dear Mr Aguiar Machado,

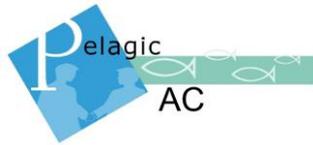
Thank you for providing us with the opportunity to comment on the draft proposal for a Delegated Regulation on amending Regulation (EU) 508/2014 as regards the indicative distribution of funds among the objectives set out in Articles 82 and 85.

First of all, it has been impossible for us to comply with the very short deadline (10 days) considering that this time period encompassed national holidays in all relevant countries. The Pelagic AC wanted to have a serious consultation process with its members for such an important proposal and therefore discussed this issue during its last Executive Committee meeting on the 25<sup>th</sup> of April in Dublin.

Regarding the content of the draft proposal the Pelagic AC notes the following:

- The Pelagic AC is very strongly against shifting funds from the CFP to the IMP. The CFP faces significant implementation challenges, not least due to the introduction of the landing obligation. Control and enforcement are complex issues which require additional funding rather than less funding.
- Sound scientific advice lies at the heart of responsible fisheries management. The Pelagic AC cannot in any way support the reduction of funding for scientific advice and knowledge. The pressure on institutions such as ICES has been rapidly increasing over the past years and we therefore strongly recommend that the EUR 32.3 million to be re-allocated to the IMP will instead be fully re-allocated to scientific advice and knowledge.
- The Pelagic AC foresees a number of specific challenges which could and should be addressed through appropriate scientific research. We therefore would like to offer to sit down with the





Commission and present our ideas on projects to be carried out with the re-allocated funds alluded to above.

We are looking forward to receiving your written response.

Sincerely,

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

Jesper Raakjær  
Chairman Pelagic AC

