



Mrs. Isabel Artime Garcia
Ministerio de Agricultura, Alimentacion y medio ambiente
Dirección General de pesca sostenible
c/ velazquez 144
28006 Madrid
SPAIN

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>

Date: 31 March 2020
Our reference: 1920/PAC32
Subject: Release full report evaluation of compliance with the landing obligation
mackerel in NS and NWW 2015-2017
CC: **Bernhard Friess – European Commission**

Dear Mrs. Artime Garcia,

Following the joint EFCA-PELAC workshop on monitoring, control and enforcement of the landing obligation, held on March 5th in The Hague, the Pelagic AC wishes to raise a set of serious procedural issues with you.

The Pelagic AC became aware of the publication of an executive summary of the [evaluation of compliance with the landing obligation for the mackerel fishery](#) in the weeks prior to the above mentioned workshop. In this summary, findings suggest a low level of compliance of this fishery with the rules pertaining to the landing obligation. To the great disappointment of the Pelagic AC, EFCA has refused to disclose the full report this summary is based on, upon request by the Pelagic AC secretariat.

This turn of events raises two issues that are of serious concern to the Pelagic AC. Firstly, given the nature of the conclusions presented, we would have expected to have been notified about the existence of this summary before its publication.

Secondly, the refusal to share the full evaluation means that the industry members of the Pelagic AC that are directly affected by these allegations, have no way of verifying them. At the same time, these members feel the results are in stark contrast to their experience with control inspections – specifically with regard to controls of the landing obligation in the mackerel fishery.





During the workshop, EFCA explained that the full report contained sensitive inspection data not suitable for external publication. Moreover, the decision to publish the executive summary was a direct instruction by the High Level Group, as was the decision to withhold the details of the report.

The Pelagic AC finds the lack of transparency in this process surprising and unacceptable. The verifiability of methodologies used to derive serious conclusions is a key pre-requisite for any form of scientific publication, in order to judge its robustness. The lack thereof thus affects its credibility. In our view the same applies in this case. The conclusions in the report leave the pelagic sector exposed, while stakeholders have no opportunity to address or challenge them.

The Pelagic AC therefore urges the High Level Group Presidencies to release the report as a matter of urgency – or to remove the executive summary from the EFCA website altogether.

When the report is released, the Pelagic AC is more than willing to cooperate with EFCA and the High Level Groups to discuss the findings of the report, in order to determine to what extent they reflect the realities at sea.

We hope for your cooperation and look forward to your speedy response.

Yours sincerely,

A handwritten signature in blue ink, which appears to read 'Jesper Raakjær'.

Jesper Raakjær
Chairman Pelagic AC

