



**Ms. Charlina Vitcheva**  
Director General  
Directorate General Maritime Affairs & 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](mailto:info@pelagic-ac.org)  
<http://www.pelagic-ac.org>

Date: 1 July 2021  
Our reference: 2021PAC68  
Subject: Social dimension to fisheries management and policy

Dear Ms. Charlina Vitcheva,

I am writing on behalf of the Pelagic Advisory Council (PelAC) to express our strong support for the joint letter from the Long Distance Advisory Council (LDAC), Européche, and the European Transport Workers Federation (ETF) sent to you on the 5<sup>th</sup> of May 2021 (ref: R-02-21/WG5).

At the PelAC, we recognise – and are keen to elevate – the importance of the social dimension to fisheries management and policy. The joint letter highlights a number of important legal instruments for maritime safety and labour in EU fisheries and underscores the pressing need to ensure all necessary elements are appropriately and rapidly transposed into relevant community and national law, for the benefit of seafarers and their communities. The central tenets of this joint communication, for which we would like to again express our strong support are:

- The introduction of the “*evaluation of fishing vessel safety*” within the European Commission Work Programme 2021 is welcomed, particularly as this will help to address the issue of non-ratification of both the IMO Torremolinos Convention for the Safety of Fishing Vessels, 1977 as amended (FVS) and the 2021 IMO Cape Town Agreement (CTA);
- The Commission should introduce plans for a Directive to incorporate the IMO Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel, 1995 (STCW-F 95);
- The growing number of Member States that have ratified the ILO Working in Fishing Convention (C188) is welcomed, and further Member States are urged both to follow this trend and expedite the implementation of Directive (EU) 2017/159 into their national law;

- The Commission is urged to develop an accompanying Directive to include compliance and enforcement provisions for (EU) 2017/159 – this is fundamental to establishing harmonised inspection systems against the standards set in the ILO188 and the directive.

Due to the importance of progress against these objectives, we felt compelled to write to voice our support for the LDAC, Européche and ETF's communication on the subject.

With many thanks for your time in considering this matter.

Yours sincerely,



Jesper Raakjaer  
Pelagic AC Chairman