



**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](mailto:info@pelagic-ac.org)  
<http://www.pelagic-ac.org>

Date: 5 October 2018  
Our reference: 1819/PAC05  
Subject: Revision Technical Measures regulation

Dear Mr Aguiar Machado,

The Pelagic Advisory Council (PELAC) would like to make the following consideration regarding the ongoing negotiations on the Technical Measures Regulation.

The PELAC recalls that the aspiration of the Technical Measures proposal introduced by the European Commission two years ago was to contribute to achieving the key objectives of the Common Fisheries Policy, to create flexibility by facilitating a regionalized approach and to simplify the current rules in line with the Commission's REFIT programme.

The political compromise on the Technical Measures regulation that the three institutions are now heading for does not provide the confidence the PELAC is seeking that the above objectives will be achieved. The PELAC members therefore wish to express their concern on the latest legislative development in this dossier.

Industry representatives in the PELAC have raised concerns on imprecise wording in the drafted legislation – the apparent impossible obligation to fish small pelagic mackerel with an 80mm mesh size in the North Sea and 100mm in Western Waters – the introduction of new, untested concepts such as the L-opt, and the keeping on board of catch composition rules under a regime of an EU landing obligation, are critical examples of this new legislation being rushed through the legislative process.

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

Kind regards,

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

Jesper Raakjær  
Chairman Pelagic AC

