



Ms. Charlina Vitcheva

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Date: 11 October 2021
Our reference: 2122PAC08
Subject: Consultation – Review Marine Strategy Framework Directive

Dear Ms. Charlina Vitcheva,

On behalf of its members, the Pelagic Advisory Council (PelAC) welcomes the opportunity to share responses to the Commission's questionnaire on the review of the Marine Strategy Framework Directive (MSFD).

Since many questions sought personal views or opinions, the PelAC had difficulties deciding on the most appropriate response format as an advisory body consisting of a large group of diverse stakeholders.

In general terms though, the Pelagic AC would like to underline that healthy marine ecosystems are essential to ensure the short, medium and long term sustainability of pelagic fisheries, and therefore, the members share the Commission's aspirations for an integrated protection and sustainable use of the marine environment. PelAC members also agreed that the efforts and advice generated through the initiative of its Ecosystem Focus Group can be considered as contributions to the objectives set out by the MSFD, such as environmental aspects that are integrated in the CFP, and several of its descriptors, identified pressures and impacts.

Notwithstanding, it is very difficult for stakeholders active in the specific field of pelagic fisheries management to monitor developments and provide detailed input to such broad policy files such as the MSFD which encompasses such diverse fields of knowledge and expertise. The reason for this is two-fold:

- Stakeholders in the Pelagic AC (both from industry as well as OIG categories) largely lack the resources in terms of time/capacity/expertise to do so.

- Since the inception of the MSFD, there has been limited active communication from the Commission to stakeholder bodies such as PelAC regarding its implementation, progress, and effects.

From a Pelagic AC view, the attention devoted to MSFD over the implementation phase has been limited and knowledge on its current implementation is lacking. This has hindered our member's ability to confidently address questions posed in the questionnaire and jointly develop a PelAC response.

One key recommendation from the Pelagic AC for improvement would be, to reflect on what can be done to enhance the engagement of stakeholders in the field of (pelagic) fisheries to the MSFD. Please note this recommendation applies both to the Commission and the Member States, but also to the PelAC itself – where our members have agreed on the need for an internal reflection. This reflection will encompass two dimensions: identifying the elements where pelagic fishery activities, integrated with other EU sectorial marine policies, affect the 'good environmental status' of marine ecosystems, and separately identifying the descriptors, pressures and impacts which have implications for the health of fish stocks on which they depend.

We welcome your thoughts and suggestions, and take the opportunity to invite a representative of the Commission to one of our future meetings to discuss ideas in more detail.

Thanking you in advance for your consideration of the above, and look forward to your response.

Yours sincerely,



Jesper Raakjaer
Pelagic AC Chairman