

Ms Nanou Beekman
Chair of the North Western Waters MS Regional Group
Ministry of Agriculture, Nature and Food Quality
PO Box 20401
2500 EK The Hague
THE NETHERLANDS

Cc to:

- Charlina Vitcheva, MARE AC Team (DG MARE, European Commission)
- Susan Steele, Eva Madariaga, Pedro Galache, Gregoria Cuesta (EFCA)

Date: 16 October 2023

PelAC reference: 2324PAC06

Subject: Publication of the report on the evaluation of compliance with the landing obligation for mackerel in NS and NWW 2018-2020

Dear Ms. Beekman,

Over the last year, the members of the Pelagic Advisory Council (PelAC) have looked forward to the release of the latest report on the evaluation of compliance with the landing obligation for the mackerel fishery (2018-2020). Over the course of 2023, the PelAC has invited representatives from EFCA on several occasions to present the outcomes of the evaluation report once published, at one of our plenary PelAC meetings.

EFCA has informed the PelAC that it is not in a position to disseminate the outcomes of the report by any means until the relevant High Level Groups (i.e. the Scheveningen and the NWW HLG) have taken a decision on the report's publication. We also understood that at the level of the NWW HLG this decision is still pending.

As you know, the issue with regard to the publication of only the executive summary of the previous evaluation of compliance report for mackerel (2015-2017) in 2020, led to a great deal of frustration among the members of the PelAC, as expressed [in several letters](#). The publication of the summary on the EFCA website in 2020 left the industry exposed to allegations of low compliance levels, and the subsequent refusal by the HLGs to disclose the underlying data and methodology meant the affected members had no way of verifying nor challenging the conclusions. Moreover, it was felt the results stood in stark contrast with the sector's experiences during control inspections. The PelAC is anxious to avoid this situation from repeating itself with the next report, and calls on the HLGs to ensure that if such a report is to be made public, it should be either in full, or not at all.





Should it be decided that the report is not to be published, the PelAC welcomes this decision provided this also means that no executive summary will be published either. We would then welcome an opportunity to discuss the report findings in a closed forum between PelAC members, EFCA, the Control Expert Group and the HLGs, as appropriate.

The members of the PelAC are keen to become aware of the compliance status of the mackerel fishery as established in this next evaluation round, and to discuss the findings with the relevant authorities to determine how these align with the perceptions of stakeholders. We would therefore appreciate it if the NWW HLG could accelerate its decision on this matter, so steps can be taken to set up an appropriate exchange format on the report findings with impacted stakeholders.

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

Sincerely,

Sean O'Donoghue
Chairman Pelagic AC

