

# The North Sea Regional Advisory Council



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Cc: Director General DG MARE

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Fisheries Ministers of the Council of the European Union,

## **EMFF Funding Allocation for Data Collection**

The North Sea Regional Advisory Council (NSRAC) would like to add to the concerns already expressed by the NWWRAC, LSRAC, SWWRAC and MedRAC regarding Art 15.4 of the proposal for the Regulation for a European Maritime and Fisheries Fund (EMFF) for 2014-2020.

The Executive Committee of the NSRAC are concerned that the Council decision in July recommends a revision to the budget allocation for data collection (344,609,000 Euros) which is significantly lower than the initial funding proposed (358,000,000 Euros). We would ask that the decision to allocate a lower level of funding to data collection is reconsidered.

Many fisheries suffer from a lack of data that hampers their scientific evaluation and often does not allow assessments to be conducted using the best science available. ICES

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has made provisions for assessments for data limited stocks, but still many stocks are governed under the precautionary approach, whereas better data could lead to improved fishing opportunities.

Furthermore, in the context of the upcoming landing obligation missing reliable data on current discard levels are repeatedly noted. This means that ICES will face severe challenges to provide suitable advice on the total amount of catches in future assessments. A multi species approach to demersal fisheries management will also require appropriate data. Additionally, being aware of future data requirements such as data needed for the Marine Strategy Framework Directive (MSFD) or for the project Marine Knowledge 2020, a reduced budget for data collection will seriously hamper the implementation of this.

Given these priority areas we would like to ask that you withdraw the proposal to reduce funding for data collection under article 15.4 of the EMFF Regulation.

Yours sincerely,



Mr Niels Wichmann  
Chairman  
NSRAC Executive Committee

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