

The North Sea Advisory Council

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Mr Roderick Galdes
Presidency of the European Council
Parliamentary Secretary for Agriculture, Fisheries & Animal Rights
The Grand Masters Palace
Republic Street
Valetta
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11th May, 2017

Cc: Gabriel Mato, Rapporteur PECH Committee
MEP Members of the PECH Committee

Dear Mr Galdes

EU Technical Conservation Measures: North Sea Advisory Council Advice

NSAC Advice

Our latest advice on the EU Technical Conservation Framework Regulation was published on 3rd April ([09-1617 Response to the Technical Conservation Framework Regulation](#)). All North Sea fisheries stakeholders represented by the NSAC, are eager to ensure that these considered views are fully taken into account as the proposal moves through the co-decision process.

Governance

More than anything else, the Commission's proposal represents a change in governance arrangements and a shift away from the complex, prescriptive and inflexible technical measures rules that currently exist. These rules have created impediments to the modification of fishing gears for the purpose of delivering optimum selectivity in each fishery.

Under the new approach, we expect many changes to the technical rules will be articulated through regional recommendations, to which we naturally hope to contribute. As such, we anticipate that the new approach will help to usher in an era of much more adaptable and flexible technical measures, tailored to regional specificities, particularly conditions in local

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fisheries. The need for a flexible approach is especially relevant to the reduction in unwanted catch in preparation for the full implementation of the landing obligation.

For these reasons, we have openly welcomed the shift away from a one-size-fits all approach and hope that the co-legislators will share that view.

Specifically, what we find positive in the Commission proposal are the following elements:

- The scope for responsive, adaptive management through regionalised policy formulation, avoiding the need for co-decision on many detailed technical rules
- The potential for a shift away from complex prescriptive rules towards a results-based management approach
- A framework that is open to a bottom-up approach, enabling those with appropriate expertise to participate in the development of solutions more suited to local conditions
- Recognition that the increased involvement of the relevant stakeholders should result in robust technical measures that are more clearly understood by these stakeholders
- Facilitating the effective implementation of the CFP by providing clear objectives with regard to environmental protection and legislation in general
- The attempt to speed up the process of addressing measures which are failing or where changes are needed, however improvements can still be made
- The removal of obstacles that, have to date obstructed more selective ways of fishing
- Simplification
- Recognition of the important role of technical measures in the protection of marine ecosystems as a whole, including sensitive species and habitats

We hope that you share the stakeholders' view that these are positive elements and reflect this in your decision-making, in particular because we expect that this legislation, once adopted, will be in place for some considerable time. Should there be any extra issues upon which you require further information or advice, the NSAC will, where possible, be happy to assist.

Yours sincerely,



Niels Wichmann
Chairman, Executive Committee

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