

# The North Sea Regional Advisory Council



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Ms Lowrie Evans  
Director General – DG MARE  
European Commission  
B-1049 Brussels  
Belgium

cc. Member States

25<sup>th</sup> November, 2013

Dear Ms Evans,

## **Landing Obligation Pilots**

Article 33, paragraph 6, of the Control Regulation (EC 1224/2009 of 20 November 2009), limits the amount of additional quota which member states can use for scientific research voyages. This constraint is hampering the pilots necessary for the successful implementation of the landings obligation.

*Catches taken in the framework of scientific research which are marketed and sold shall be counted against the quota applicable to the flag Member State insofar as they exceed 2 % of the quotas concerned.*

You hardly need reminding that the ambitious objective of implementing a landing obligation for quota species of demersal species begins on 1st January 2016 and is a central pillar of the reformed CFP. As an advisory council, we are now heavily engaged in preparatory work. As is to be expected at this stage, there is much uncertainty about how individual discard plans might work in practice.

We consider that pilots to test how various aspects of the landing obligation might operate in the conditions of specific fisheries are an absolutely vital part of implementing the discard plans and recall that pilots are foreseen in Articles 7, 14a and 47 of the new CFP basic regulation. I am sure that you will agree that it is important that implementation of the landings obligation takes place in an orderly way that does not put into reverse the achievements of the past decade in terms of reducing fishing mortality, rebuilding stock biomass and establishing a culture of compliance. The widespread testing of the different aspects of the landings obligation is necessary if we are to avoid this kind of reverse.

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It is essential *at this stage* to remove all obstacles from the old regime to undertaking pilot projects and specifically, it is important that vessels undertaking pilot projects do not find themselves at a disadvantage compared with vessels which have not engaged with this kind of initiative.

The 2% constraint on additional quota for scientific purposes has exactly the effect of limiting member states' ability to offset the costs and risks of fishing vessels' participation in pilots.

This letter is therefore a request that the Commission take whatever steps are necessary to remove the 2% constraint to increase the flow of quota to pilot projects, *under the important condition that such pilots are neutral in terms of fishing mortality*. In the context of the North Sea for joint stocks, the views of Norway will of course be relevant.

We look forward to a positive forward looking response to this important request.

Yours sincerely,



Niels Wichmann  
NSRAC Executive Committee Chairman

