

North Sea Advisory Council



NSAC Advice Ref. 02-1819

NSAC Advice on the European Commission proposal for a revision of the Control Regulation

This paper was approved by the NSAC Executive Committee on the 3rd of April 2019 via a written procedure.

1.0 Background

- 1.1 Council Regulation (EC) No 1224/2009 establishing a Community control system for ensuring compliance with the rules of the Common Fisheries Policy (“the Control Regulation”) was adopted in 2009, before the entry into force of the Lisbon Treaty, and entered into force on 1 January 2010. This was well before the adoption of the present framework regulation no. 1380/2013 for the Common Fisheries Policy (CFP) in 2013. As a result, it still contains several outdated provisions and a REFIT evaluation conducted in 2015/2017 by the Commission concluded that it was no longer fit for purpose and needs revision.
- 1.2 The Commission proposes a thorough revision of the fisheries Control Regulation reflecting that the current arrangements are not fully coherent with the revised CFP. The opportunity is also taken to propose other changes deemed necessary to simplify and render more efficient the control system, and to improve the data and information systems upon which effective control and fisheries management rely. The Commission also proposes to facilitate the work of control authorities and attain better documentation of catches through increased use of electronic monitoring. Simplification is to be achieved by replacing paper-based systems with electronic, real-time transmissions from all vessels, irrespective of size. Attention is devoted to incorporating the inshore fleets into the system of monitoring and control by such means, and this extends also to the recreational fisheries.

The specific objectives of the proposal are:

- 1) *Bridge the gaps with the CFP and with other EU policies;*



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- 2) *Simplify the legislative framework and reduce unnecessary administrative burden;*
- 3) *Improve availability, reliability and completeness of fisheries data and information, in particular of catch data, and allow exchange and sharing of information; and*
- 4) *Remove obstacles that hinder the development of a culture of compliance and the equitable treatment of operators within and across Member States.*

- 1.3 One of the objectives of the Commission's proposal is to "*remove obstacles that hinder the development of a culture of compliance and the equitable treatment of operators within and across Member States*". One of the challenges for the present fisheries control in the EU faced today is that Member States have an uneven application of the Control Regulation. Some control and enforcement provisions are not fully implemented by all Member States. Consequently, fishers in the same métier are not necessarily fishing under the same control and enforcement provisions and up to the same judicial treatment when transgressing fisheries rules.
- 1.4 To "*ensure a level playing field in the Member States as regards the judicial treatment of all offenders of the Common Fisheries Policy*", the Commission proposes that "*provisions concerning determination of behaviours that constitute serious infringements should be clarified and reinforced*". To that end, the Commission proposes to maintain the current list of fisheries offences and distinguishes between infringements which are serious by nature and infringements which could be serious according to EU criteria. It also proposes that administrative proceedings in case of serious infringements should be preferred and harmonized by Member States.
- 1.5 The landing obligation (LO) was introduced in the CFP with Regulation no 1380/2013, in which the Commission proposes that "*on the basis of risk assessment, a certain number of fishing vessels should be equipped with continuous recording electronic devices, including CCTV*".

2.0 North Sea Advisory Council: General Principles on fisheries control

The NSAC welcomes the Commission's proposal.

The NSAC has been pushing for a revision of the fisheries Control Regulation given that the current arrangements are not fully coherent with the CFP and that some of the present provisions are not enforceable. We also welcome the aim of changes deemed necessary to simplify and render more efficient the control system.

Before commenting on the Commission's proposal, we find it relevant to clarify our views on fisheries control within its broader context:



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1. The NSAC fully recognises that effective arrangements for monitoring, control, and enforcement are an integral part of any functioning fisheries management system. The NSAC is of the opinion that there should always be proportionality between the control measures, sanctions and the level of risk.
2. Achieving high levels of compliance relies on:
 - Coherent and enforceable fisheries legislation;
 - A fleet capacity broadly in line with available fishing opportunities;
 - Dialogue and strong lines of two-way communication between the regulators and the regulated;
 - An understanding of the management and control measures by all stakeholders, especially fishers.
3. Much has been achieved in fisheries management over the last 20 years in the North Sea. There has been a significant reduction in fishing mortality driven primarily by fishing capacity reduction through Member States decommissioning schemes, and major changes in national fisheries management in some countries. A high level of compliance has been an important component in this development. There has also been an increase in selectivity and improved multi-stakeholder collaboration. This has resulted in more stocks being harvested at MSY. It is essential that this development is recognized and continued.
4. Modern enforcement and control systems require a multi-dimensional approach based on:
 - Information gathering and sharing
 - Education
 - Enforcement
5. The EMFF should provide support with funding for assistance and support that drives best practices with respect to inspection schemes, data collection and data exchange for the purposes a culture of compliance.
6. Modern electronic information systems most certainly have their role to play in fisheries, but carry their own technical, legal, and ethical challenges, which must be fully understood and addressed.
7. The success of the regulatory regime should be measured against whether it facilitates or undermines a culture of compliance. Chaotic, lawless fisheries serve neither the interests of fishers, nor the marine environment or fisheries managers. Multiple prosecutions for technical transgressions which flood the courts would not serve the purposes of good fisheries management. Assistance and support that drives best practices with respect to inspection schemes, data collection, and data exchange should be provided for the purposes of developing a culture of compliance.



8. The Commission's proposal makes frequent references to a "level playing-field". For the NSAC fishing industry it is important to recognize that the advent of a strong regional dimension within the CFP requires an adjustment to how this concept is understood and applied. It specifically does not mean that all fishing vessels should be subject to the same rules, irrespective of geography or regional variations. It should, in the view of the NSAC industry, mean that there should be broad equivalence between areas and that fishers operating within a given sea-basin, targeting the same species, or group of species with the same gear, should be subject to the same regulatory requirements. The NSAC OIGs are supportive of regionalisation but are of the opinion that there is a need for all fishing vessels to be subject to a minimum set of control rules which can be regionally implemented.
9. The NSAC emphasizes that the revision of the Control Regulation is needed to increase coherence between the control rules and the other regulatory requirements of the CFP, including the technical conservation measures, fishing opportunities, and the landing obligation.
10. The NSAC is of the opinion that the delegated acts will need to be published shortly after the adoption of the revised Control regulation in order to allow fishers to adapt to the new regulation within the two-year transition period.

3.0 Comments to specific articles of the Commission's proposal

In this advice, we will particularly comment on the following topics:

Subject	Articles of the Commission's proposal
Control of landing obligation	<i>25a</i>
Tracking systems for small-scale fisheries	<i>9, 14-15a</i>
Data collection, management, and sharing	<i>4, 9-12, 14-17, 21-25a, 33-34, 36, 41, 55, 64, 66, 68, 76, 78-79, 82, 85, 90-91, 93, 109-113 and 116</i>
Logbook	<i>14</i>
Engine power and tonnage	<i>39-41</i>
Separate Stowage	<i>44</i>
Rules on lost fishing gear	<i>4, 14, 39a, 48 & 55</i>
Recreational fisheries	<i>4, 55, 90 & 93a</i>
Weighing and post landing activities	<i>59-68</i>
Sanctions and serious infringements	<i>89-92</i>



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3.1 Control of the landing obligation (*Article 25a of the Commission's proposal*)

The landing obligation (LO) involves a shift in the focus of the control regime from the point of landing to the activities of the fleets at sea during fishing operations. This is a major change, as the point of landing, to date, has been used as a gateway for effective monitoring control and enforcement. Monitoring the ongoing activities of vessels at sea involves a logistical and resources challenge well-recognised by the control authorities. Additionally, resolving the risk of chokes - the exhaustion of one quota, leading to the premature closure of the fishery - in mixed fisheries is crucial for achieving a high-level of compliance with the CFP.

The extent to which the problem of serious chokes in mixed fisheries can be mitigated will be a major determinant on whether the revised control regime will be able to achieve its objectives. It is not possible, at this juncture, to say if and how these challenges will be resolved before the new control regime comes into force, but it is possible to foresee that significant changes to the regulatory and management regime will be required to accommodate the LO. Many of these will contain implications for monitoring and control of fishing activities under the CFP.

The Commission's proposal to deal with these new challenges is "*to equip, on the basis of a risk basis assessment, a certain percentage of fishing vessels with continuous recording electronic monitoring devices including Close Circuit Televisions (CCTV) systems*".

The NSAC acknowledges that monitoring and control will be an essential component of the successful implementation of the landing obligation. Better and more comprehensive monitoring and reporting of catches represents an opportunity to enhance scientific evidence and to improve the knowledge on which fisheries management and policy is based. This includes Remote Electronic Monitoring (including continuously recording Closed-Circuit Television (CCTV), net sensors, and systems incorporating data storage and/or the ability to send camera footage in real time) across all MS and on all fisheries, that are identified by the control experts of EFCA as being of medium, high or very high risk of non-compliance.

There is little doubt that different forms of remote sensing equipment will provide one important means through which fishers will be able to demonstrate compliance in the future. However, this version of the proposal contains unanswered legal, technical, and ethical questions, particularly in relation to the use of CCTV. These unsolved questions relate to the protection, access, and ownership of the data collected. If CCTV cameras are to be used, it is desirable that this is done in combination with monitoring and inspections. These concerns should be addressed in the context of the revision of the Control Regulation.

The NSAC would also like to underline that the introduction of Remote Electronic Monitoring to control the landing obligation should be coupled with appropriate funding dedicated to the implementation of these means on board of the fishing vessels concerned.



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3.2 Tracking system for small-scale fisheries (Articles 9, 14-15a of the Commission's proposal)

The diversity of small-scale commercial fisheries presents challenges for effective, proportionate, and risk-based monitoring, control, and enforcement. The inshore fleets contain some very effective catching units, as well as vessels that operate at a much more traditional artisanal level.

How different fleet segments within the small-scale sector will be treated will be of critical importance to the effectiveness of enforcement policy. Gear types and target species vary, and seasonality is also likely to play a significant part in these fisheries. Communication with this class of vessels can present challenges, and financial resilience can range from the robust to the fragile. Aggregate effects of large numbers of small vessels must also be taken into account in risk assessments.

All this suggests that a one-size-fits-all EU enforcement policy, which ignores the level of diversity in this sector, is likely to deliver sub-optimal outcomes.

Whilst respecting the need for a level playing field, and full visibility over catches, the NSAC advocates a degree of discretion, or flexibility, to allow Member States to adapt their control, monitoring and enforcement activities to the characteristics and contours of the different fleet segments encountered. A nuanced approach will be important in building the culture of compliance in this part of the fleet.

On the other hand, whilst small-scale fisheries are critical in supporting the livelihoods of coastal communities and play an important role in sustainable development, they are not necessarily a synonym for low impact fisheries. Their operations therefore need to be properly assessed, monitored, and controlled to guarantee that their impacts are accounted for.

It may be possible to identify fisheries that are genuinely “low-impact” and which could be subject to a much lower regulatory burden. However, the *quid pro quo* for light touch management must be that these vessels can and do demonstrate that they are genuine low impact vessels. Under current legislation, vessels below 10 meters are not required to record fishing logbook data or complete a landing declaration indicating their catches. The installation of small and cost-efficient tracking devices on board to automatically locate and identify the position of vessels (under 12 meters) could provide the basis for an equivalent differentiation – not only ensuring safety at sea, but also better control of fishing activities.

The NSAC thus supports the Commission's proposal to extend the use of a vessel tracking system to small-scale fishing activities, bearing in mind that recent advances in technology have made these devices small and cost-effective, and they do not undermine the safe operations of the vessels and gears. The NSAC also welcomes that vessels below 12 meters are allowed to use simple mobile devices with GPS signal linked to an electronic navigation chart.



Any additional financial burden associated with the implementation of a fisheries control system for small-scale fishers should be minimized by the introduction of easy and cost-effective reporting systems for fishery data and should be supported by the EMFF. For small-scale fishers, it is vital that such electronic devices can be operational on board (e.g. open boats requiring waterproof electronic devices). The NSAC welcomes cost-effective technical solutions onboard small vessels.

3.3 Data collection, management, and sharing (Articles 4, 9-12, 14-17, 21-25a, 33-34, 36, 41, 55, 64, 66, 68, 76, 78-79, 82, 85, 90-91, 93, 109-113 and 116 of the Commission's proposal)

The NSAC believes that data needs to be collected for all fisheries operations taking place in EU waters or carried out by EU vessels. This is necessary to ensure stocks can be effectively assessed by scientists, and to ensure that the control authorities have a clear picture of what is happening at sea. The current Control Regulation does not properly facilitate this objective as it presents an outdated vision of data collection and reporting whereas the development of new technologies allows fishers and competent control authorities to work with electronic reporting and data management tools.

In this respect, the NSAC welcomes the Commission's proposal:

- To remove the present exemption allowing vessels up to 15 meters not to have a Vessel Monitoring System (VMS) on board under certain conditions;
- That for fishing vessels below 12 meters, a derogation allows a simpler vessel monitoring system.

The NSAC supports a platform to collect and share more data in an efficient way that does not mean more work for the fishers. The NSAC industry believes that the Automatic Identification System (AIS) is a safety tool and should not be a fisheries data collection or control tool. The OIG members of the NSAC underline the importance of ensuring that AIS data remains within the scope of the Control Regulation and continues to be used for fisheries control.

3.4 Logbook (Article 14 of the Commission's proposal)

The Commission proposes that "*the master of catching vessels of 12 metres' length overall or more shall keep an electronic fishing logbook for the purpose of recording fishing activities.*"

It makes sense for the NSAC that as many vessels as possible are using electronic logbooks for the recording of the catches. However, a requirement to record a logbook using an electronic device can be a challenge for certain small vessels below 12 meters as many smaller vessels are open.



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It is therefore important that safe, waterproof and low-cost solutions can be secured for small vessels to electronically report their information to the competent fishing authority. This could be through a user-friendly mobile application. It could also be that the transmission of logbook data could be delayed. Furthermore, appropriate funding through EMFF should be made available for the introduction of the electronic logbooks.

Regarding the margin of tolerance, the Commission proposes “*a permitted margin of tolerance in estimates recorded in the fishing logbook of the quantities in kilograms of fish retained on board shall be 10% per specie. For species retained on board that do not exceed 50kg live weight equivalent, the permitted margin of tolerance shall be 20% per species.*”

However, for pelagic and industrial vessels with catches kept fresh and unsorted onboard – “bulk”, the 10% margin of tolerance is causing practical problems: the fishers are experiencing problems with making a solid estimate. Therefore, the NSAC fishing industry suggests that a practical solution could be a margin of tolerance of 20%, or alternatively masters could indicate in their fishing logbook all quantities of each species in these catches above 10% of live-weight equivalent of the total catch caught and kept on board fresh and unsorted. The NSAC OIGs agree with the Commission’s proposal.

3.5 Engine power and tonnage (Articles 39-41 of Commission’s proposal)

In 2017, the European Court of Auditors stated in their reports on fisheries controls that not all Member States performed the required verifications of engine power, and when they did, differences were identified between the actual and the documented engine power (p. 51/52 of the report).

Instead of urging Member States to carry out their duties, the Commission proposes that Member States shall ensure that vessels using trawls, seines, and surrounding nets are equipped with permanently installed devices that measure and record power.

The need for the revision of the rules relating to the control of fishing capacity (compliance with capacity ceilings in gross tonnage and kilowatts (kW), and compliance with ceilings resulting from management by effort regimes) should be appreciated with regard to its necessity. The Commission has evaluated the current entry / exit regime, and thus the interest of the current capacity ceilings in relation to the objectives of the CFP. It would be the opinion of the NSAC to discuss the results of this evaluation before moving forward. Moreover, the number of regimes still managed by the effort (kW) is relatively low. If the objective of the Commission is to make sure that the rules of these regimes are respected, the proposed solutions should be applied to the relevant fisheries.



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Also, continuous measuring of engine power and relating the measuring of torque at the propeller shaft to installed engine power is technically complex. The Commission's proposal could therefore cause more problems than it solves. Monitoring of engine power as suggested by the Commission is not only a technical challenge, it is also potentially very costly. Therefore, the NSAC industry believes that any system for monitoring of engine power has to be technically sound and cost-effective before being introduced, and possible means of funding should be ensured in the EMFF.

It is the opinion of the industry of the NSAC, that gross tonnage as an indicator to reach goals of the CFP is not fit for purpose. Sometimes it is even counterproductive in that it prevents onboard arrangements facilitating compliance with CFP obligations (such as the LO) or improving safety on board. Combatting overfishing effectively is unarguably an absolute necessity, but the CFP should protect the active fishers as much as it protects the fishes. Alternatives for the current gross tonnage (and kilowatts ceilings), and entry/exit schemes should therefore be developed and seriously considered. At least the introduction for all fishing vessels of free gross tonnage and kilowatts for improvement only of fishing vessel safety and fishers' living and working conditions on board.

3.6 Separate Stowage

The article 44 introduces the obligation for vessels of 12 metres overall or more to keep the catches of demersal stocks subject to a multiannual plan according to a stowage plan and place them in separated boxes. Considering that the new CFP has replaced the monospecific plan this proposal is not applicable anymore for a vessel and should be adapt in consequence hereof

3.7 Rules on lost fishing gear (*Articles 4, 14, 39a, 48 & 55 of the Commission's proposal*)

Lost fishing gears at sea imply costs in terms of equipment and waste management, as well as a possible destructive impact on marine biodiversity. Therefore, the NSAC welcomes the intention of the Commission's proposal to improve the reporting by fishers, including recreational fishers, of their lost gears. Furthermore, competent authorities of the Member States should act to retrieve gears when they are lost at sea.

However, the Commission's proposal is more bureaucratic than necessary. The Commission proposes to include the *date* and *time* of the loss of the fishing gear in the reporting. Unfortunately, this information is not necessarily known (e.g. loss of a trap or fishing pot). Also, the date / time of the discovery of the loss, or when the loss actually happened is often uncertain. For the sake of simplification, only the



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estimated date and time should be maintained with the precision "when known or where relevant". The same problem arises with regard to vessel position at the time of the loss. Since this cannot always be known, the notion of "estimated " would be more appropriate.

3.8 Recreational fisheries *(Article 4, 55, 90 & 93a of the Commission's proposal)*

The Commission proposes introducing a registration or a licensing system for recreational fishers and an obligation to report all catches. This is an important step, especially for species subject to a management plan, as well as an essential element to obtain greater accuracy on the status of fish stocks and a better assessment of the distribution of catches between recreational and commercial fisheries.

Recreational fishing can, depending on the stock and location, represent a significant source of fishing mortality. For this, recreational fishing cannot be excluded from the fisheries control system. However, it will be important to focus attention, through a risk-based approach, on where it is needed in a proportionate way. The most immediate risk is where the boundary between recreational and commercial fishing has become blurred, and catches find their way onto the commercial human consumption market, undermining stock management and the market for commercial fishers.

Reporting of catches could be done in several different ways, but electronic methods should be preferred. The fishing mortality data reported by recreational activities should then be taken into account in the stock assessments.

In addition, we recommend that decision-makers ensure that the Control Regulation clearly underlines that the management of recreational catches need to be in line with the provisions of the relevant multi-annual management plans. This means measures are required to control recreational mortality (e.g. minimum landing sizes, gears and catch limitations, or restricted areas and times). There should be effective monitoring, control, and surveillance schemes, which ensure that Member States are regularly monitoring the catch effort of recreational fisheries and incorporate this information in their fisheries resource management schemes.

3.9 Weighing and post landing activities *(Articles 59-68 in the Commission's proposal)*

It follows from the Commission proposal that all fishery products shall be weighed on landing by registered operators immediately after landing, prior to the fishery products being held in storage, transported, or placed on the market. The background for this is to make sure that the weight information is as accurate as possible.



However, fish for consumption is usually stowed in boxes on ice. The quantity of ice varies with every individual box. The weight of fish is known to vary over time as a result of water loss. Furthermore, the more often fish are being weighed along the production line (i.e. fishing, sales, processing), the more likely the weights records will differ, and the more likely the fish quality will deteriorate. The difference in weights records is also a source of disagreement between fishers, authorities, and the processing industry. Finally, weighing can also be an issue when fish is landed in one port to be transported to another port for sorting.

Enabling fishermen to weigh the actual fish before putting it in a box and using that record as documentation for transporting, comparing the given weight from the vessel with the recorded weight at first sale, has proven to be an effective and reliable means of control.

The NSAC would like to underline that it is of importance for reliable monitoring of quotas that the rules on weighing are harmonized and that weighing takes place at the same moment for everyone, according to the same rules. Furthermore, re-weighing of catches that have been weighed and packed on board must be minimized, as this will have a seriously detrimental impact of the quality of that fish.

The NSAC Industry is of the opinion that given the control measures on catches, the provisions on weighing should be more flexible. If sales notes have all the necessary and sufficient information, they could be used as the primary source for weighing of fishing products.

The NSAC industry support retaining the current principle to organize bilateral protocols between Control Agencies in the Member States in which it is agreed to load catches at the place of landing on trucks, seal the truck and having the weighing organised at the truck unloading location.

The NSAC OIGs are of the opinion that precedents have shown frauds accounting for significant amounts of fish have taken place when weighing took place after landing, leading to the entry of undeclared fish into the markets. Weighing should only take place on landing, on certified scales, as per the Commission's proposal. Appropriate funding should be dedicated to the equipment of landing facilities with weighing facilities.

3.10 Sanctions and serious infringements *(Articles 89-92 of the Commission's proposal)*

Finding the balance between coherent rules that are well understood (in terms of prospects for detection of offences and effective, dissuasive, and proportionate penalties), and a perception amongst those subject to the regime that the management system is broadly rational and fair, is important for an effective control system.



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Where fishers from different member states fish the same grounds and exploit the same resources, it is important that all parties perceive that they are all broadly subject to similar conditions, in terms of rules, control, and enforcement. However, there seems to be different interpretations, as in some Member States, even what should be small infringements leads to assignment of penalty points.

The NSAC welcomes the consolidation of the definition of serious infringements into the new control regulation, as well as the introduction of the two lists of sanctions (those that are serious by nature and those that can be qualified as serious based on the criteria set by the regulation). Nevertheless, the distinction of certain offenses from the two lists is not always easy and could be a brake on the desired harmonization. Therefore, it would surely be useful for the Commission to produce a handbook for control services and professionals to reinforce the "education" component around this regulation.

However, the industry of the NSAC finds it necessary to differentiate between different types of infringements, such as "minor, major and serious infringements" where sanctions are to be adjusted accordingly. The way that sanctions are treated in the proposal, it seems that almost any infringement is to be treated as serious.

The NSAC recognizes that control and enforcement is a Member State competence, and the EU fisheries control system must respect the independence and autonomy of the individual judicial systems in the Member States.

The Commission's proposal to rely to a greater extent on administrative sanctions instead of criminal prosecution is as such welcomed, as administrative sanctions allow for fisheries offences to be dealt with in a speedy and more straightforward manner. It is our view, however, that there must remain an option for offences to be dealt with through the judicial system.

The technologies of VMS and e-logs have generated new control problems that require attention. Retrospective surveillance can detect sequential offences that quickly ratchet up to the "serious" category bringing with its heavy penalties, where a warning or advisory note, in the past, would have secured behavioural change. This change in the attitude of some national authorities reinforces the opinion of the NSAC to strengthen exchanges/formation between control authorities and professionals in order to reinforce the feeling of compliance and the "educational" effect of sanctions.

It follows from article 92 that Member States shall apply a system for serious infringements on the basis of which the holder of a fishing license is assigned a number of penalty points as a result of an infringement of the rules of the CFP. The NSAC takes note of this. However, this raises several questions:



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- a. On the position of a captain who also holds a license: Is the captain subject to double sanction if an infringement is committed, and does he cumulate the points inflicted as captain and as license holder?
- b. On the rules for the erasure of points after three years: Are three years assessed on a continuous basis, i.e. does the period of three years start running again if a new offense is committed during this period?
- c. On maintaining the possibility of deleting points by participating in actions or training (is the article 92, point 13d offering the same possibility as the current regulation?)
- d. On the legality of awarding points to a license holder acquiring the ownership of a vessel with points.

These issues should be clarified when adopting a revised Control Regulation, as they have a strong impact on the acceptance of the Control Regulation by fishermen.

4.0 Conclusion

- The NSAC welcomes the Commission's proposal and considers it to be an important step forward with the ambition of bringing the current control regulation in coherence with the CFP.
- In particular, the revision of the Control Regulation is needed to increase coherence between the control rules and the other regulatory requirements of the CFP, including the technical conservation measures, fishing opportunities, and the landing obligation.
- It is important to ensure proportionality between the control measures, sanctions and the level of risk.
- In order to ensure a high level of compliance the enforcement and control systems must be based on a multi-dimensional approach including sharing of information with stakeholders and education of stakeholders. Assistance and support that drives best practices with respect to inspection schemes, data collection, and data exchange should be provided for the purposes of developing a culture of compliance.
- Better and more comprehensive monitoring and reporting of catches represents an opportunity to enhance scientific evidence and to improve the knowledge on which fisheries management and policy is based. This includes Remote Electronic Monitoring (including continuously recording Closed-Circuit Television (CCTV), net sensors, and systems incorporating data storage and/or the ability to send camera footage in real time) across all MS and on all fisheries. Before introducing modern electronic information to gather information about fisheries, legislators must take into account the technical, legal, and ethical challenges attached to these instruments.



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- The NSAC is always prepared to contribute to any discussions and work that can lead to an efficient fisheries control system essential for the common fisheries policy. In this respect we expect we will follow the discussion on REM and CCTV closely.



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