


31th of July 2019, 



To Mr Bernhard Friess

Director of the Fisheries Policy Atlantic, North Sea, Baltic and
Outermost Regions

Directorate-General for Maritime Affairs and Fisheries

Your reference: Ares(2019)4898161 – 26/07/2019

Sent by e-mail to:

bernhard.friess@ec.europa.eu

in cc: High Level Group of the North-Western Waters

Subject: The Commission's requests on the revised North-Western Waters group's joint recommendation

Dear Bernhard,

Thank you for your letter dated 26th July 2019 with the Commission's comments on the revised joint recommendation for a demersal discard plan for the North-Western Waters.

The North-Western Waters group wants to express its disappointment in the way things were handled, with the introduction of new drastic conditions in a very late stage of negotiations.

The last months member states' high level and technical groups worked out a well-balanced package in close consultation with the Commission's services and the Advisory Council. Only on the 15th of July the Commission echoed her concerns on certain aspects of the joint recommendation, after the revision of which, complete new and unrealistic conditions were imposed. Considering that the political discussions on the introduction of REM on Union vessels still take place whilst, it must be

said, progress is being made on the technicalities, to impose REM on complete fleet segments for mid-2020 is not only technically unrealistic but seems like a forcing of the global political process.

Many proposals of the joint recommendation were developed with the stakeholders and scientific institutes. Together we worked out a package that responded the best to the most challenging problems linked to the landing obligation. Of course we are aware that the implementation of the latter is suboptimal for the moment, but we think this must be a gradual process in which industry is given perspective and associated risks like choke situations are minimized.

The North-Western Waters group also expresses concerns about the inconsistencies in the Commission's decisions, both in terms of this year's joint recommendation and also in relation to previous ones and those for other sea basins.

After reflection, I think the whole process to come to an amendment of a discard plan has probably reached its limits now as concerns the flexibility demanded on the member states concerned and this for a second successive year. To be pushed to take hasty decisions is always a bad thing. Transparency, consistency and credibility are at stake.

You are informed that we will reflect on the whole process during our next HLG meeting.

The rejection of certain proposals, for example the recommended derogation from technical measures for under 12m vessels operating in the Irish Sea, will continue the significant challenges for the economic viability of small-scale fisheries.

For the moment and keeping into consideration the tight timeframe, the Group can accept the suggested modifications by Commission with the exception of those related to REM to condition eligibility of vessels to de minimis exemptions (e.g. 3% for Celtic sea cod) .

In relation to the other measures linked to the de minimis for the West of Scotland, we could accept the suggestions of the Commission with clarity and confirmation that they would apply as a list of options only to those vessels which would hope to access the de minimis provisions.

We would also suggest to avoid a long decisional process of a second delegated act on the discard plan and therefore to introduce a transition period in which Member States can deliver the requested additional information.

I remain available for any inquiry you may have in this regard.

Yours sincerely,

On behalf of 

Chair of the North-Western Waters Member States Group