



Pelagic RAC
Treubstraat 17
PO Box 72
2280 AB Rijswijk
The Netherlands

Tel: +31 (0)70 336 9633/324
Fax : +31 (0)70 399 3004
E-mail: info@pelagic-rac.org
<http://www.pelagic-rac.org>

European Commission
Directorate General Fisheries
Att. Mr. J. Holmquist
Rue de la Loi 200
B 1049 Brussels
Belgium

Date: 6 April 2006
Our reference: PRAC06.05/IH
Subject: Pelagic RAC position on dioxin and dl-PCB regulation

Dear Mr. Holmquist,

In this letter, we would like to present the position of the Pelagic RAC on dioxin and dl-PCB regulation. This position was adopted by the executive committee on March 13.

The Pelagic RAC appreciates and supports the intention of the EU Parliament and EU Commission to control and reduce the impact of dioxin and dl-PCB on humans. The Pelagic RAC is, however, concerned about the impact this may have on the fishing and processing industries in EU. The wider implications of these measures could be detrimental to certain fisheries. The Pelagic RAC would, therefore, encourage DG Fisheries and Maritime Affairs, in co-operation with other relevant DGs, to:

1. Assess the impact of the regulations on the feasibility of the Blue Whiting fishery in economical and operational terms, after the implementation of the limits on dioxin and dl-PCB.
2. Analyse the extent to which the Blue Whiting fishery has been disadvantaged through the two specific levels of dioxin and dl-PCB's being set for both fishmeal and fish oil.
3. Evaluate to what extent the same impact on the most sensitive feed chains could have been achieved at lower costs - without compromising the effect on humans.

We are looking forward to your reaction.

Yours sincerely,

PELAGIC RAC

i.o. Mr. Iain MacSween
(chairman)

c.c.: Member States