

Mr Bernhard Friess European Commission Directorate General - Mare Office J-79; 02/088 B-1049 BRUSSELS Belgium Pelagic RAC Treubstraat 17 PO Box 72 2280 AB Rijswijk The Netherlands

Tel: +31 (0)70 336 9624 Fax: +31 (0)70 399 3004 E-mail: info@pelagic-rac.org http://www.pelagic-rac.org

Date:17 November 2011Our reference:1112PRAC21/ACSubject:Control measures in pelagic fisheriesCC:Sabela Perez-Maiz, John Spencer (by e-mail)

Dear Mr Friess,

Thank you for inviting the Pelagic RAC to express the industry's views on specific control measures to eliminate slipping, discards and high-grading in pelagic fisheries as referred to in the Agreed Record of Fisheries Consultations between Norway and the European Union for 2011.

The industry members of the Pelagic RAC have discussed at length the pilot project for using the fish flow meter as a control tool on board vessels fishing for mackerel and for the use of CCTV/Video on board vessels to control slipping, discards and high-grading agreed by the Control Experts. They have unanimously agreed that they are unwilling to cooperate in this project at this juncture for the following reasons.

- Although the mackerel fishery is undertaken in the waters of Iceland, Faroe Islands, Norway and the EU there is a huge difference in the level and quality of control regime undertaken by the various parties.
- Since the control group met in spring a number of new situations have arisen in the mackerel fishery undertaken by Iceland and Faroe Islands.
- In Iceland and Faroe Islands, a large number of whitefish vessels have been granted a licence to fish mackerel. AS/NSS herring has been caught by these fleets which have no herring quotas; therefore it can only be assumed that discarding and slipping of herring has been common practice.
- In addition, Faroe Islands have invited a number of International fishing vessels to join the mackerel fishery, again with no access to herring quotas.
- A sea-going Russian flagged/Chinese owned factory ship (Lafayette) has been present in the Faroese zone taking mackerel catches directly from its own fishing vessels and other Faroese vessels (both whitefish and pelagic) in the high seas. This practice would be prohibited by authorities in both the EU and Norway.
- Transhipping at sea is also widespread in the Faroese zone, making accountability impossible for control authorities.



Given the ongoing issue of control measures in both Iceland and Faroe islands, there is a clear need to re-focus the mandate/agenda of the control group to the current situation and work towards establishing a uniform and transparent catch control regime in all countries participating in the NEA mackerel fishery. The first action to be undertaken should be to establish a continual, transparent, full joint inspection program throughout the mackerel season for each party involved in the mackerel fishery.

If your have any questions, please do not hesitate to contact the secretariat.

Yours sincerely,

Ms Aukje Coers Pelagic RAC secretariat