



CONSEIL CONSULTATIF  
RÉGIONAL POUR  
LES EAUX OCCIDENTALES  
SEPTENTRIONALES

NORTH WESTERN  
WATERS  
REGIONAL ADVISORY  
COUNCIL

CONSEJO CONSULTIVO  
REGIONAL PARA  
LAS AGUAS  
NOROCCIDENTALES

Dublin, 30<sup>th</sup> of September 2013

Dear Fisheries Ministers at the Council of the European Union,

The North Western Waters RAC (henceforth, NWWRAC) welcomes that the proposal of Regulation for a European Maritime and Fisheries Fund (EMFF) for 2014-2020, on its Art 15.4, has effectively increased the amount earmarked for data collection in comparison to the data collection framework currently in place.

However, following the Council agreement on a 'full general approach' on the EMFF, the NWWRAC would kindly ask you to reconsider your proposal, resulting in a reduction of the specific amount earmarked for data collection (344,609,000 euros) in comparison with that included in the Commission's initial proposal (358,000,000 euros).

The mixed fisheries in North Western Waters [ICES subdivisions (EC) Vb, VI and VII] suffer for many species from a lack of (quantitative and qualitative) data that hampers their scientific evaluation and it often does not allow assessments to be conducted using the best science available. The issue of data collection has been central to NWWRAC's work for a number of years, including a NWWRAC initiative to address data deficiencies for demersal stocks in ICES subdivisions VI and VII, which drew recognition and support both from ICES ACOM and the Directorate General of Maritime Affairs and Fisheries of the European Commission, being expressly mentioned at the EC Communication on Fishing Opportunities for 2014<sup>1</sup>.

Development of sustainable fishing activities in the EU requires good knowledge of our seas, our ecosystems, and our fisheries as well as other marine activities, all of which depend on strong and solid data collection. Data rich stocks do not need to be governed under the precautionary approach and could eventually lead through a sound management to higher fishing opportunities.

**For all the reasons stated above, the NWWRAC urges you to withdraw your proposal to reduce the budget earmarked for data collection under article 15.4 of EMFF Regulation compared to the initial proposal of the European Commission.**

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<sup>1</sup> Communication from the Commission to the Council concerning a consultation on Fishing Opportunities for 2014 - COM/2013/319 final – see title 2. "State of the stocks"



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We further ask you to consider increasing the amount for data collection, or to provide Member States with the opportunity to shift additional funding from measures under Article 15.2. to data collection activities.

We look forward to hearing from you soon.

Yours sincerely,

Bertie Armstrong  
NWWRAC Chairman

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In copy:

DG MARE representatives

Members of the European Parliament Fisheries Committee and Opinion Committees to EMFF (BUDG, EMPL, ENV, TRAN, REGI)