



Dublin, 20 March 2017

Subject: **Technical Conservation Framework Regulation for fisheries**

Dear Mr Mato,

It is our understanding that the member states are making rapid progress towards a general position on the Commission's proposal for a revised technical conservation framework regulation. This means that as part of the co- decision process, the European Parliament will shortly commence the main part of its work on this dossier.

The North West Waters Advisory Council represents a wide range of stakeholders (see annex to this letter) many of whom will be directly and profoundly affected by the form that this regulation eventually takes. It is therefore a matter of utmost concern to us that the opportunity provided by this important legislative moment to provide a framework for an effective and flexible technical regime is not lost during the co-decision process.

It is widely accepted that Regulation 850/98 has not provided the basis for an effective set of conservation rules. The highly centralised, one-size-fits-all and prescriptive approach that lies at the heart of 850/98, has proven to be unworkably rigid and inflexible; its requirements difficult to understand and to control.

Our central message to you, at this important legislative juncture, is that although we have concerns about the Commission's proposal, we are completely supportive of its general approach. The goal, which we share, is to effect a decisive shift away from a single set of over-centralised prescriptive rules, towards governance arrangements that allow, over time, for a considerable degree of regional variation and a more results based approach. This is to be achieved using the mechanism expressly provided for in the reformed CFP, for the adoption of joint recommendations by member states acting collaboratively at the regional level.

In principle, detailed technical rules are best designed and applied as close to the fishery concerned as possible, and regionalisation is the vehicle that at present has the most potential to takes us in the direction of this ideal.



It would therefore be a matter of utmost disquiet if the European Parliament, as it legislates on this matter, was to dilute or thwart the scope for regional flexibility that is a central, and for us, the most important part of the proposal. In practical terms this means that the annexes to the regulation should not be weighted with additional detailed centralised requirements by the Parliament, but should allow flexibility and the use of more selective fishing activities, while preserving current activities.

The shift towards a flexible and responsive technical conservation regime contained in this proposal represents a generational opportunity and we fervently hope that the Parliament can help us to achieve that potential.

Yours sincerely,



Emiel Brouckaert
Chairman
Executive Committee

Annex 1

NWWAC Member Organisations	
EU	Stichting BirdLife Europe, represented by the Royal Society for the Protection of Birds
EU	AIPCE-CEP European Fish Processors Association
EU	European Transport Federation
EU	Seas at Risk
EU	European Bureau for Conservation and Development
EU	Oceana
EU	European Anglers Alliance
EU	ClientEarth
EU	Blue Fish
EU	The Pew Charitable Trusts
Belgium	Rederscentrale
Belgium	Rederscentrale VZW
France	France Pêche Durable et Responsable
France	Association Nationale des Organisations de Producteurs
France	CNPMEM, Comité National des Pêches Maritimes et des Élevages Marins
France	CDPMEM des Côtes d'Armor, Comité Départemental des Pêches Maritimes et des Élevages Marins 22
France	CDPMEM du Calvados, Comité Départemental des Pêches Maritimes et des Élevages Marins 14
France	CDPMEM du Finistère, Comité Départemental des Pêches Maritimes et des Élevages Marins 29
France	CLPMEM de Bayonne, Comité Local des Pêches Maritimes et des Élevages Marins
France	Copeport Maree OPBN
France	CRPMEM de Basse Normandie, Comité Régional des Pêches Maritimes et des Élevages Marins
France	CRPMEM de Bretagne, Comité Régional des Pêches Maritimes et des Élevages Marins
France	CRPMEM de Haute-Normandie, Comité Régional des Pêches Maritimes et des Élevages Marins
France	CRPMEM du Nord / Pas de Calais / Picardie, Comité Régional des Pêches Maritimes et des Élevages Marins
France	Fédération des Organisations de Producteurs de la Pêche Artisanale
France	Fédération Internationale de la Pêche Sportive en Mer
France	FROM Nord (Fond Régional d'Organisation du Marché du poisson)
France	Les Pêcheurs de Bretagne LPDB
France	OP COBRENORD
France	Organisation de Producteur Coopérative Maritime Etaploise Manche Mer du Nord
France	Pêcheurs d'Aquitaine
France	Plateforme de la Petite Pêche Artisanale Française
France	Union des armateurs de la pêche en France
Ireland	Irish Seal Sanctuary
Ireland	Irish South and West Fish Producers Organisation
Ireland	Killybegs Fishermen's Organisation
Ireland	BirdWatch Ireland
Ireland	Irish Fish Producers Organisation
Ireland	Irish Fishermen's Organisation
Ireland	Irish Islands Marine Resource Organisation
Ireland	Irish South and East Fish Producers Organisation
Netherlands	Stichting van de Nederlandse Visserij / Dutch Fisheries Organisation (1)
Netherlands	Stichting van de Nederlandse Visserij / Dutch Fisheries Organisation (2)
Netherlands	Dutch Elasmobranch Society
Spain	Puerto de Celeiro S.A. OPP-77
Spain	Asociación Nacional de Armadores de Buques de Pesca de Gran Sol
Spain	Confederación Española de Pesca (CEPESCA)
Spain	Fundació ENT
Spain	Fundación Rendemento Económico Mínimo Sostible e Social
Spain	Lonja de La Coruña S.A.

NWWAC Member Organisations	
Spain	Organización de Productores de Pesca de Ondarroa
Spain	Organización de Productores Pesqueros de Lugo (OPP-7)
Spain	Pescagalicia-Arpega-Obarco
UK	National Federation of Fishermen's Organisations
UK	Scottish Fishermen's Federation
UK	Anglo-North Irish Fish Producers Organisation
UK	Cornish Fish Producers Organisation
UK	Fleetwood Producers Organisation
UK	Mallaig and North West Fishermen's Association
UK	Manx Fish Producers Organisation
UK	New Under Ten Fishermen's Association
UK	Orkney Fish Producers Organisation
UK	Scallop Association
UK	Scottish Fishermen's Federation (2)
UK	Scottish Fishermen's Organisation
UK	South Western Fish Producer Organisation Ltd
UK	The Scottish White Fish Producers Association
UK	The Scottish White Fish Producers Association (2)
UK	Wales and West Coast Fish Producers Organisation
UK	West of Scotland Fish Producers Organisation