



Ms Charlina Vitcheva
Director-General for Maritime Affairs and Fisheries
European Commission
Jozef II-straat 99
1000 Brussels
Belgium

Dun Laoghaire, 10 November 2022

Dear Ms Vitcheva,

Subject: Stakeholder engagement over the implementation of the Deep-sea Access Regulation

The North Western Waters Advisory Council (NWWAC) would like to thank you for your letter from 13 September 2022 (Ares (2022)6322811), providing records of the stakeholder consultation carried out by the Commission services on the implementation of the Deep-sea Access Regulation over the past two years.

Following a review of the records reported in your letter and further discussion with DG MARE Director Fabrizio Donatella at the last NWWAC Executive Committee meeting in September, the AC would like to highlight the importance of ensuring and improving dialogue with stakeholders on this matter. It is vital that the terms of the consultation process are clarified from the start to assure proper stakeholder participation and preparation of AC advice, as well as for proposals to reach all the stakeholders including shipowners and fishing boat captains, who must express their opinion.

Director Donatella explained that a new ICES advice is expected in November 2022, although it has been announced its delay until mid-December, which will trigger the revision of the Delegated Act implemented this year, with Member States' consultations planned for early spring 2023. The NWWAC would greatly appreciate to be kept informed on the consultation timeline and state of play and receive clarification on how the Advisory Councils can contribute and get involved. In this regard, the NWWAC believes that ACs should be invited to participate in future ICES Advice Drafting Groups on Vulnerable Marine Ecosystems (VMEs), where they can provide useful input.

It is also worth mentioning that the stakeholder meeting organised by DG MARE on 26 July on this topic highlighted a number of items to be considered before implementing next year's Delegated Act. These particularly include analysis of the socio-economic impacts of VMEs and of possible conflicts with specific fishing gears.

Finally, it is essential that an exhaustive survey is carried out about how VMEs could affect each fishing gear. Only bottom trawls fishing footprint has been considered, even though this regulation also affects other gears such as bottom-set longline or bottom-set gillnet.



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North Western Waters Advisory Council
C/o Bord Iascaigh Mhara
Crofton Road
Dun Laoghaire A96 E5A0
Ireland

Email: mo.mathies@nwwac.ie
Email: info@nwwac.ie
Web: www.nwwac.org
Tel: +353 (0) 1 2144 43
Co. Reg. No: 403877

The content of this letter is also supported by the South Western Waters Advisory Council (SWWAC), following decision of the SWWAC Executive Committee on 10 November 2022.

We remain at your disposal to elaborate on this request should this be necessary.

Thank you for your attention on this matter. We look forward to your response.

Yours sincerely,



Emiel Brouckaert
NWWAC Chairman



Aurelio Bilbao
SWWAC Chairman

